

TSD File Inventory Index

Date: August 29, 2008

Initial: CMH/MS

Facility Name: <u>BRC Operation (Montpelier Division - One Elder Site)</u>			
Facility Identification Number: <u>1AD 006 066 435</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	X
A.2 Part A / Interim Status		.1 Correspondence	X
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	X
.2 Notification and Acknowledgment	X	C.1 Compliance - (Inspection Reports)	X
.3 Part A Application and Amendments	X	C.2 Compliance/Enforcement	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	X
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring	X	D.1 Corrective Action/Facility Assessment	
.1 Correspondence	X	.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	X	.3 State Prelim. Investigation Memos	
.1 Correspondence	X	.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc	X	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	
		5. RFI QAPP	

TSD - 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
7			

Note: Transmittal Letter to Be Included with Reports.

Comments: be folder site

A.2 Interim Status



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

NOV 19 1990

Mr. Dean Monroe
Schlegel Corp.
623 W. Monroe St.
Montpelier, IN 47359

RE: EPA ID #: IND 006 066 435

In response to your request of November 9, 1990 the following information
has been updated:

Installation Name: Schlegel Corporation

Contact Person: Dean Monroe 317/728-4081

Legal Owner: Schlegel Corporation

Hazardous Waste Description Code: F005

If you have questions, please contact Sharon Kiddon at (312)886-6173.

Sincerely,

A handwritten signature in black ink, appearing to read "Arthur S. Kawatachi".

Arthur S. Kawatachi
Information Section
RCRA Program Management Branch

cc: State Agency
File

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

Official Use Only

Comments

Installation's EPA ID Number												Approved		Date Received (yr. mo. day)			MAY 02 1994	
C												T/A	C					
F	I	N	D	0	0	6	0	6	6	4	3	5	1					

1. Name of Installation

B	R	C		M	O	N	T	P	E	L	I	E	R		D	I	V	I	S	I	O	N	R	E	C	E	I	V	E	D
---	---	---	--	---	---	---	---	---	---	---	---	---	---	--	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

II. Installation Mailing Address

Street or P.O. Box

6	2	3	W	E	S	T	M	O	N	R	O	E	S	T	R	E	E	T
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

City or Town

State

ZIP Code

[illegible]

III. Location of Installation

Street or Route Number

[illegible]

City or Town _____

State

ZIP Code

[illegible]

IV Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

[illegible]

V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

[illegible]

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

- ☐ 1a. Generator ☒ 1b. Less than 1,000 kg/mo.
- ☐ 2. Transporter
- ☐ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel
(enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner

- ☐ 6. Off-Specification Used Oil Fuel
(enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer (or On site Burner)
Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler☐ B. Industrial Boiler☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify) _____

IX. First or Subsequent Notification

Ma ☐ in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☒ A. First Notification ☐ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

ID — For Official Use Only													
C												T/A	C
W													1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
F 0 0 5	F 0 0 1	F 0 0 3			
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 1. Ignitable
(D001)

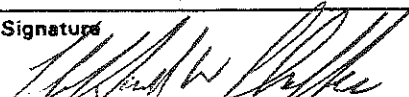
☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

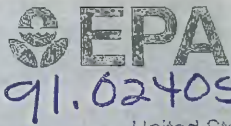
☐ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature 	Name and Official Title (type or print) CLIFFORD W. CHAFFEE, V.P.	Date Signed 4/28/94
--	--	------------------------

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

NOV 14 1990

U. S. EPA, REGION V
SWB - RNS

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

I N D 0 0 6 0 6 6 4 3 5

II. Name of Installation (Include company and specific site name)

S C H L E G E L C O R P O R A T I O N

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

6 2 3 W E S T M O N R O E S T R E E T

Street (continued)

City or Town

State

ZIP Code

M O N T P E L I E R

I N 4 7 3 5 9 -

County Code

County Name

B L A C K F O R D

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

S A M E

City or Town

State

ZIP Code

S A M E

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

M O N R O E

D E A N

Job Title

Phone Number (area code and number)

H R M A N A G E R

3 1 7 - 7 2 8 - 4 0 8 1

VI. Installation Contact Address (See instructions)

A. Contact Address

Location

Mailing

B. Street or P.O. Box

X

City or Town

State

ZIP Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

S C H L E G E L C O R P O R A T I O N

Street, P.O. Box, or Route Number

P O B O X 2 3 1 9 7

City or Town

State

ZIP Code

N O C H E S T E R

N Y

1 4 6 9 2 - 3 1 9 7

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)

Month Day Year

7 1 6 - 4 2 7 - 7 2 0 0

P

P

Yes

X

No

0 6

2 8

9 0

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

1. Generator (See Instructions)
- ☒ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes
- Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify _____
3. Treater, Storer, Disposer (at installation)
Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Burner - indicate device(s) -
Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner - indicate device(s) -
Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
2. Specification Used Oil Fuel Marketer
(or On-site Burner) Who First Claims
the Oil Meets the Specification

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒
2. Corrosive (D002) ☐
3. Reactive (D003) ☐
4. EP Toxic (D000) ☐
- (List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))
- ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
F 0 0 1	F 0 0 3	F 0 0 5			
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature



Name and Official Title (type or print)

Dean Monroe, Human Resources Mgr.

Date Signed

11/9/90

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

IND006066435

REACKNOWLEDGEMENT

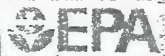
SHELLER-GLOBE CORPORATION
623 W MONROE STREET
MONTPELIER

IN 47359

INSTALLATION ADDRESS

623 W MONROE STREET
MONTPELIER

IN 47359

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.
I. NAME OF INSTALLATION
II. INSTALLATION MAILING ADDRESS
III. LOCATION OF INSTALLATION

RECEIVED

PLEASE PLACE LABEL IN THIS SPACE

JUN 03 1985

STW-ARS
U.S. EPA, REGION V

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

INSTALLATION'S EPA I.D. NUMBER															APPROVED					DATE RECEIVED (yr., mo., & day)				
F																				1				

I. NAME OF INSTALLATION

SHELLER GLOBE CORPERATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3623 WEST MONROE ST

CITY OR TOWN

MONTPELIER

ST.

IN

ZIP CODE

47359

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5623 WEST MONROE ST

CITY OR TOWN

MONTPELIER

ST.

IN

ZIP CODE

47359

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

2 SCHUMACHER DONALD CHEMIST

PHONE NO. (area code & no.)

317-728-2941

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 PUBLICLY HELD CORPERATION

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IND006066435

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. -- FOR OFFICIAL USE ONLY																	
S															T/A	C	
W	1	2													13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001	2 F003	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>Donald W. Schwaacher</i>	NAME & OFFICIAL TITLE (type or print) Donald W. Schwaacher Project Chemist	DATE SIGNED 5/24/85
--	--	------------------------

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

IND006066435

NAME OF INSTALLATION

Montpelier Division

II. INSTALLATION MAILING ADDRESS

SHELLER-GLOBE CORPORATION
623 W MONROE STREET
MONTPELIER, IN 47359

III. LOCATION OF INSTALLATION

623 W MONROE STREET
MONTPELIER, IN 47359

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER 2

APPROVED

DATE RECEIVED (yr., mo., & day)

SHELLER GLOBE CORP
MONTPELIER DIV

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

CITY OR TOWN

ST.

ZIP CODE

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

CITY OR TOWN

ST.

ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

M

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 1 7					
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

31	32	33	34	35	36
U 0 0 9	U 1 8 8	U 1 9 0	U 2 1 9	P 1 1 7	U 2 2 0
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
U 2 2 8	U 2 3 8	U 2 3 9	U 0 5 7		
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

49	50	51	52	53	54
11 - 26	11 - 26	11 - 26	25 - 26	23 - 26	23 - 26

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

4. TOXIC
(D000)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

John D. Skillen
Division General Manager

8-13-80

NOTIFICATION OF CHANGE TO FINDS

DATE: 11-23-90

EPA I.D: IND006066435

CHANGED BY: HWDMS

NOTIFY THE FOLLOWING

4-30-91/CL

<input checked="" type="checkbox"/>	01	HWDMS	Office of Solid Waste	(OSW)
<input checked="" type="checkbox"/>	02	PCS	Water ENF and Permits	(OWEP)
<input checked="" type="checkbox"/>	03	CDS/AIRS	Air and Radiation	(OAR)
<input checked="" type="checkbox"/>	04	FATES	Pesticides and Toxic SUBS	(OPTS)
<input checked="" type="checkbox"/>	05	CERCLIS	SUPERFUND	(OERR)
<input type="checkbox"/>	07	DOCKET	ENF and COMPL Monitoring	(OECM)
<input type="checkbox"/>	08	FURS	Drinking Water	(ODW)
<input type="checkbox"/>	09	FRDS	FED'L Underground Inject CNTL	(OW)
<input type="checkbox"/>	10	SIA	Surface Impoundment	(OW)
<input type="checkbox"/>	11	FFIS	Office of Federal Activies	(OFA)
<input type="checkbox"/>	13	CICIS	Toxic SUBST Inventory	(OTS)
<input type="checkbox"/>	14	STATE	State Program Offices	()
<input type="checkbox"/>	15	PADS	Office of Toxic Substances	(OTS)
<input checked="" type="checkbox"/>	16	RCRA-J	Office of Solid Waste	(OSW)
<input checked="" type="checkbox"/>	17	TRIS	Office of Toxic Substances	(OTS)
<input type="checkbox"/>	18	CUS	Office of Toxic Substances	(OTS)
<input type="checkbox"/>	19	NCDB	Office of Pesticides Toxic SUBS	(OPTS)

NAME CHANGED FROM: Sheller-Globe Corp.

NAME CHANGED TO: Schlegel Corp

ADDRESS CORRECTION FROM: _____

ADDRESS CORRECTED TO: _____

ZIP CHANGED FROM: _____ ZIP CHANGED TO: _____

ANALYSIS LJ

JUL 20 1982

W. M. Wiegert
 Sheller Globe Corporation
 Montpelier Division
 623 West Monroe Street
 Montpelier, Indiana 47359

RE: Revised Part A
 Permit Application
 Sheller-Globe Corp.
 USEPA ID#: IND006066435

Dear Mr. Wiegert:

Thank you for your letter of May 24, 1982, in which you indicated changes to be made to the current Part A application for the subject facility. Upon review of the materials submitted, it appears that the changes requested require approval by the U. S. Environmental Protection Agency (USEPA) under 40 CFR 122.23(c) (enclosed) as an increase in design capacity used to treat store or dispose of hazardous waste.

Please review these requirements and resubmit your request with the proper justification and a description of the changes made or to be made. Also, if any changes result in a decrease of the actual capacity of treatment, storage or disposal processes subject to 40 CFR Part 265, a closure plan must be filed with the request (see 40 CFR Part 265, Subpart G.)

If your review of 40 CFR 122.23 (c) should indicate that USEPA approval is not necessary, please resubmit the request with an explanation of the reasons for this determination. All requests for modification of the Part A must be signed and certified by an authorized person in accordance with 40 CFR 122.6 (enclosed). If no response is received within 30 days, we will assume that you are withdrawing your revision.

If you have any questions, please contact Mr. Richard Shandross, at (312) 886-6146, for assistance. Please refer to "Revised Part A Permit Application" in all telephone contacts and correspondence.

Sincerely yours,

William H. Miner, Chief
 Technical, Permits and Compliance Section

Enclosures

cc: Mr. Guinn Doyle

J. BOYLE:rita & gigi:6-7444:7/13/82

R. SHANDROSS

AHMD
 FOR

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IND006 066435

NN 7

STATE OF INDIANA
1993 HAZARDOUS WASTE HANDLER INFORMATION UPDATE FORM

EPA ID: IND006066435
NAME: SCHLEGEL CORP
Change Is the name change due to a change in ownership? yes no

LOCATION ADDRESS: 623 W. MONROE STREET
MONTPELIER IN 47359

Change

Is the location address change due to a move or did the Post Office change your address?
We moved PO change Other (please explain in comments)

MAILING ADDRESS: 623 W. MONROE STREET
MONTPELIER IN 47359

Change

CONTACT: MONROE DEAN
623 W. MONROE ST
MONTPELIER IN 47359
317-726-4081

Change

OWNER: SCHLEGEL CORP
623 W. MONROE ST
MONTPELIER IN 47359

Change

COUNTY: BLACKFORD
HAZARDOUS WASTE ACTIVITY
DEM 1993 FUTURE

Large Quantity Generator (LQG) X
Small Quantity Generator (SQG)
Conditionally Exempt (CEG)

Transporter S = for our own waste
C = commercially

Treatment, storage, & disposal (TSD)

* NON HANDLER

* OUT OF BUSINESS

* ONE TIME GENERATOR

* If you have checked one of these categories, your EPA ID number will be deactivated and you will have to reapply for it if you ever need to manifest waste off-site again.

SIC CODES: 3053 PRIMARY
3069 SECONDARY

COMMENTS:

SIGNATURE:

DATE:

ENTERED MAR 16 1994

RECEIVED MAR 30 1994
WMD RCRA
RECORD CENTER

NP

start = 5
count of business

delete 6-
FE

FORM 1 GENERAL				ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER IND 0046066435																																																							
II. POLLUTANT CHARACTERISTICS		<p>INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">SPECIFIC QUESTIONS</th> <th colspan="3">MARK 'X'</th> <th rowspan="2">SPECIFIC QUESTIONS</th> <th colspan="3">MARK 'X'</th> </tr> <tr> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> <th>YES</th> <th>NO</th> <th>FORM ATTACHED</th> </tr> </thead> <tbody> <tr> <td>A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)</td> <td></td> <td>X</td> <td></td> <td>B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)</td> <td>X</td> <td></td> <td></td> <td>D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)</td> <td>X</td> <td></td> <td>X</td> <td>F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)</td> <td></td> <td>X</td> <td></td> <td>H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>I. 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VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
7	3	0	6	9	(specify) Extruded Rubber Products	7				(specify)									
C. THIRD										D. FOURTH									
7					(specify)	7				(specify)									

VIII. OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?														
8	S	H	E	L	L	E	R	G	L	O	B	E	C	O	R	P	O	R	A	T	I	O	N	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)														
F = FEDERAL	M = PUBLIC (other than federal or state)	P	(specify)							A	3	1	7	7	2	8	2	4	4	1				
S = STATE	O = OTHER (specify)																							
P = PRIVATE																								
E. STREET OR P.O. BOX																								
6	2	3								WEST MONROE STREET														
F. CITY OR TOWN										G. STATE	H. ZIP CODE													
B	M	O	N	T	P	E	L	I	E	R	I	N	4	7	3	5	9	IX. INDIAN LAND						
										Is the facility located on Indian lands?														
										<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO														

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)																			
9	N									9	P																		
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)																			
9	U									9										(specify) Operation Permit Air Pollution Board - INDIANA									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)																			
9	R									9										(specify)									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

Compound, mix, extrude, cure and finish rubber gaskets for automotive windows and underground pipe applications.

F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)										B. SIGNATURE										C. DATE SIGNED									
John D. Skillen, General Manager										<i>John D. Skillen</i>										11/19/80									

COMMENTS FOR OFFICIAL USE ONLY

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

URM

3
RCRA



U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S										T/A	C			
F	I	N	D	O	0	6	0	6	6	4	3	5		1
1	2										13	14	15	

FOR OFFICIAL USE ONLY

APPLICATION APPROVED		DATE RECEIVED (yr., mo., & day)			
23		24	-		29

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (*mark one box only*) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

X. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR NEW FACILITIES,
PROVIDE THE DATE
(yr., mo., & day) OPERA-
TION BEGAN OR IS
EXPECTED TO BEGIN

C	YR.	MO.	DAY
8	49	12	12

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.		MO.		DAY	
73	74	75	76	77	78

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. **PROCESS CODE** — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (*including its design capacity*) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.

2. **UNIT OF MEASURE** – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	CODE	UNIT OF MEASURE	CODE	UNIT OF MEASURE	CODE
GALLONS	G	LITERS PER DAY	V	ACRE-Feet	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C																	
DUP																	
T/A C																	
1																	
13 14 15																	
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY						FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY						FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)				2. UNIT OF MEASURE (enter code)					1. AMOUNT				2. UNIT OF MEASURE (enter code)		
16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	
X-1	S	0	2	600				G		5							
X-2	T	0	3	20				E		6							
1	S	0	3	500				G		7							
2	S	0	1	2000				G		8							
3										9							
4										10							

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above. (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY													
W I N D 0 0 6 0 6 6 4 3 5 1													W DUP 2 DUP													
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																										
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)	D. PROCESSES																
										1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))										
1	P	1	1	7	100				P	S	O	1														
2																										
3	U	1	8	8	20				P	S	O	1														
4	U	1	9	0	5				P	S	O	1														
5	U	2	1	9	50				P	S	O	1														
6																										
7	U	2	2	8	100				G	S	O	1														
8	U	2	3	8	50				G	S	O	1														
9																										
10	D	0	0	0	500				G	S	O	1														
11	D	0	0	1						S	O	1														
12	F	0	1	7	500				G	S	O	1														
13	U	0	5	7																						
14	U	2	2	0																						
15	U	2	3	9																						
16																										
17																										
18																										
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21																										
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26																										

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F	I	N	D	0	0	6	0	6	6	4	3	5	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

4	0	3	3	1	2	8	5	1	7	1	5
45	46	47	48	49	50	72	73	74	75	76	77

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

☐ B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items.

1. NAME OF FACILITY'S LEGAL OWNER										2. PHONE NO. (area code & no.)									
3. STREET OR P.O. BOX										4. CITY OR TOWN									
5. ST.										6. ZIP CODE									

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Kenneth E. Strickland, Plant Mgr.

B. SIGNATURE

Kenneth E. Strickland

C. DATE SIGNED

4-16-82

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

FORM 3 RCRA		ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER									
			F I N D 0 0 6 0 6 6 4 3 5 3 1									

FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
8	9	12

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 3	10000	Y		7				
	S 0 1	75000000	G		8				
3					9				
4					10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

409

409

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W I N D 0 0 6 0 6 6 4 3 5 3 1													W DUP 3 2 DUP												
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)																					
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																					
1	U 2 1 1 7	100000	P	501																					
2	U 0 0 9	100000	P	501																					
3																									
4	U 1 8 8	20000	P	501																					
5	U 1 9 0	5000	P	501																					
6	U 2 1 9	50000	P	501																					
7																									
8	U 2 2 8	100000 800	P	501																					
9	U 2 3 8	50000 400	P	501																					
10	U 2 1 1 7	100000 6000	P	501																					
11	D 0 0 1																								
12	U 2 1 1 7	100000	P	501																					
13	U 0 5 7																								
14	U 2 2 0																								
15	U 2 3 9																								
17																									
18																									
19																									
20																									
21																									
22																									
23																									
24																									
25																									
26																									

IV. DESCRIPTION OF HAZARDOUS WASTE

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

FIND 00606643536

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6: A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

40 33 12

LONGITUDE (degrees, minutes, & seconds)

085 17 53

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

John D. Skillen

B. SIGNATURE

John D. Skillen

C. DATE SIGNED

11/19/80

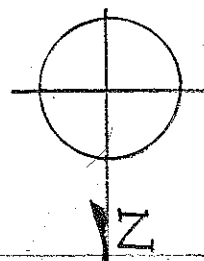
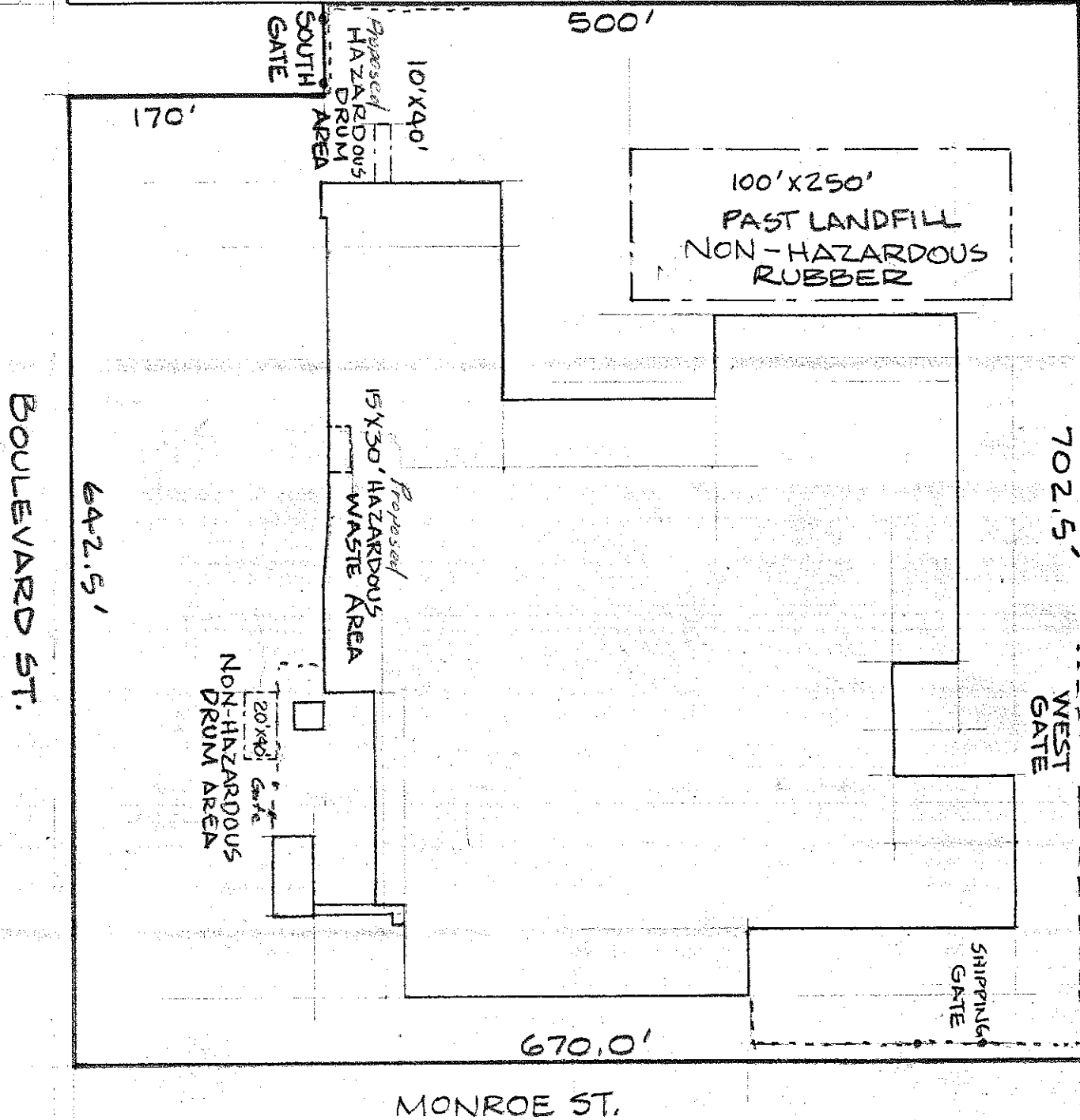
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

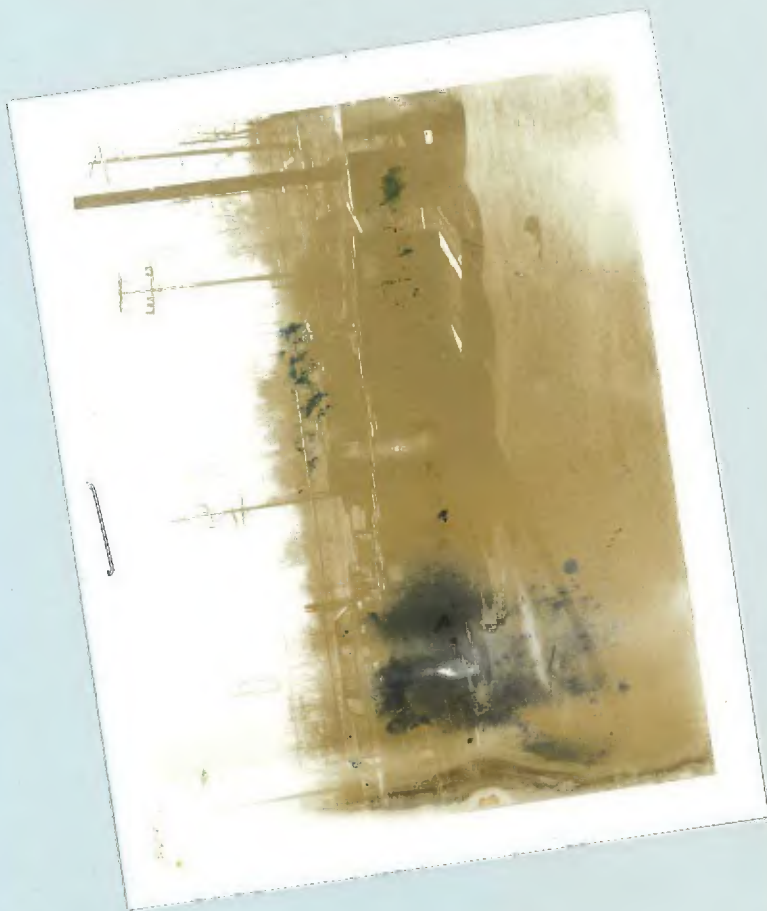
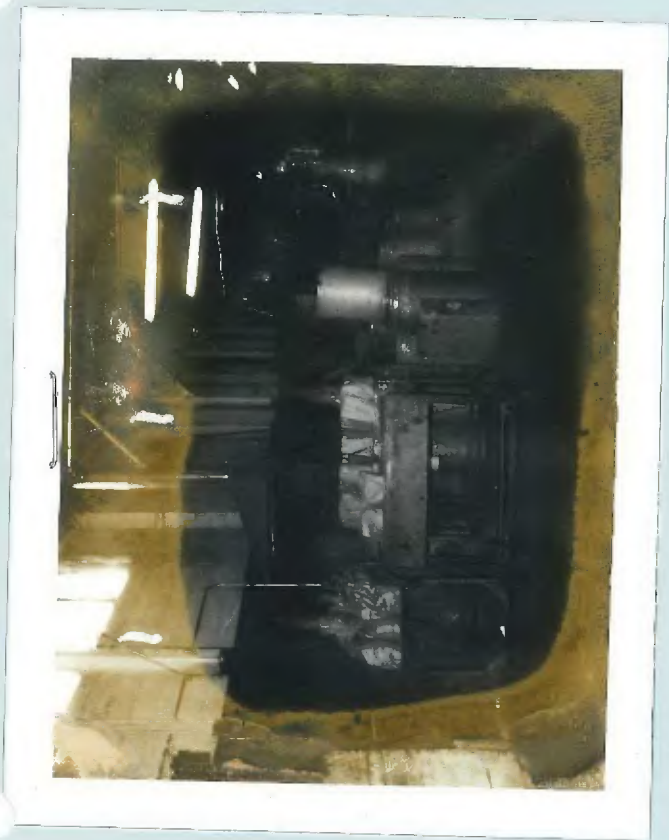
A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED







**A.3 Groundwater/
Soil Documents**



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

May 11, 1989

RECEIVED
MAY 10 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION 4

VIA CERTIFIED MAIL - P652-575-134

Mr. Gregory P. Sautter
Manager of Environmental Activities
Sheller Globe Corporation
4444 North Detroit Avenue
Toledo, Ohio 42612

Re: Soil Sampling
Notice of Deficiency
Sheller Globe Corporation
Montpelier, Indiana
IND 006066435

Dear Mr. Sautter:

The Indiana Department of Environmental Management (IDEM) has reviewed your January 25, 1989, soil sampling data and results. The sampling data was found to be inadequate pursuant to the modified closure plan dated June 29, 1988.

The enclosed Notice of Deficiency (NOD) outlines the specific deficiencies in your sampling results. In order for this office to adequately review the information submitted, the enclosed deficiencies must be addressed.

Please submit the documentation to this office within fifteen (15) days from the date of receipt of this letter.

Also, our letter dated April 6, 1989, stated that closure certification must be submitted by April 30, 1989. The letter should read that closure activities must be completed in accordance with the approved closure plan by April 30, 1989. Closure certification must be submitted no later than sixty (60) days of completion of closure (329 IAC 3-21-6).

An Equal Opportunity Employer

Mr. Gregory P. Sautter
Page 2

If you have any questions regarding this matter, please contact Mr. Phil Perry, of this office at AC 317/232-3220.

Very truly yours,



Thomas E. Linson, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

PP/bja

Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Ms. Fay Wright, U.S. EPA, Region V
Ms. Karyl K. Schmidt
Mr. Thomas Greenawalt
Ms. Debbie Faulkner

Notice of Deficiency
Soil Sampling
Sheller Globe Corporation
Montpelier, Indiana
IND 006066435

1. The geologic narrative should be changed from, "The Indiana Geological Survey Muncie Sheet describes the bedrock beneath the site as limestone and shale of the Ordovician age (Cincinnatian Epoch)" to indicate that bedrock beneath the site consists of limestone, dolomite and shale of early and middle Silurian age (Mississinewa Shale Member).
2. Submit copies of logs for public and private water wells in the area (9 total) which were not included in the geologic narrative.
3. Submit information concerning the inspection of the integrity of the concrete pad in storage area #1 and provide photographs of the storage area floor before and after decontamination to verify clean-up.

FILE



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

VIA CERTIFIED MAIL - P652-575-128

Mr. Gregory P. Sautter
Manager of Environmental Activities
Sheller Globe Corporation
4444 North Detroit Avenue
Toledo, Ohio 42612

RECEIVED
APR 18 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

April 13, 1989

Re: Soil Sampling
Notice of Deficiency
Sheller Globe Corporation
Montpelier, Indiana
IND 006066435

Dear Mr. Sautter:

The Indiana Department of Environmental Management (IDEM) has reviewed your January 25, 1989, soil sampling data and results. The sampling data was found to be inadequate pursuant to the modified closure plan.

The enclosed Notice of Deficiency (NOD) outlines the specific deficiencies in your sampling results. In order for this office to adequately review the information submitted, the enclosed deficiencies must be addressed.

Please submit the documentation to this office within fifteen (15) days from the date of receipt of this letter.

If you have any questions regarding this matter, please contact Mr. Phil Perry, of this office at AC 317/232-3220.

Very truly yours,

Thomas E. Linson, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Ms. Fay Wright, U.S. EPA, Region V
Mr. David K. Harrison (with enclosure)
Ms. Ruth A. Williams (with enclosure)

An Equal Opportunity Employer

Notice of Deficiency
Soil Sampling
Sheller Globe Corporation
Montpelier, Indiana
IND 006066435

1. According to the modified closure plan, analyses were to be performed on all samples from the horizons 0"-6", 6"-12", 12"-18", and 18"-24". The only results reported besides oils and grease are for the 0"-6" horizon.
2. According to the modified closure plan, the analytes of concern were to be toluene, xylene, methyl ethyl ketone, methylene chloride, di-n-octyl phthalate, trichlorofluoromethane, 1-1-1-trichloroethane, diphenylmethane di-isocyanate, and oils and grease. There are no results for toluene, xylene, or methyl ethyl ketone.
3. The QA/QC information provided was too inadequate to determine whether the information submitted was acceptable. Submit the following:
 - a. Chain of Custody sheets.
 - b. Sampling procedures used.
 - c. Sampling preservation methods.
 - d. Sample pre-analytical holding times.
 - e. Calibration procedures and frequency.
 - f. Analytical procedures.

FILE

gang



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

VIA CERTIFIED MAIL - P652-575-115

RECEIVED
MAR 24 1989

March 21, 1989

Mr. Gregory D. Sautter
Manager of Environmental Activities
Sheller Globe Corporate Center
4444 North Detroit Avenue
Toledo, Ohio 43612

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Re: Closure Plan
Extension of Time
Sheller Globe
Montpelier, Indiana
IND 006066435

Dear Mr. Sautter:

The Indiana Department of Environmental Management (IDEM) acknowledges receipt of your January 25, 1989, letter and the soil sampling and analytical data. The data is being reviewed by staff.

In your letter, you also asked for a ninety (90) day extension to complete closure activity because of a change in ownership. You are given ninety (90) days from the date of receipt of this letter to complete closure activities.

If you have any questions, please contact Mr. Phil Perry of my staff at AC 317/232-3220.

Very truly yours,

Thomas E. Linson, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

PP/sac

cc: Mr. D. Monroe, Sheller Globe
Mr. Hak Cho, U.S. EPA, Region V
Ms. Fay Wright, U. S. EPA, Region V

Gus Bloom
please file
thanks.

FILE



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

RECEIVED
JAN 20 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

VIA CERTIFIED MAIL - P652-575-105

January 18, 1989

Mr. Gregory P. Sautter
Manager of Environmental Activities
Sheller Globe Corporation
4444 North Detroit Avenue
Toledo, OH 43612

Re: Sheller Globe Closure Plan
Montpelier, Indiana
IND 006066435

Dear Mr. Sautter:

On June 29, 1988, the Indiana Department of Environmental Management (IDEM) approved your total closure plan for container storage (S01). This is to inform you that the time limits for closure have not been met.

Pursuant to 329 IAC 3-21-4, applicable closure activities must be completed in accordance with the approved plan within one hundred and eighty (180) days after the approval letter. Furthermore, 329 IAC 3-21-6 requires that a certification, signed by the owner or operator and by an independent registered professional engineer shall be submitted within sixty (60) days after closure is completed. The certification should include the necessary documentation concerning closure activities.

Within fifteen (15) days of your receipt of this letter, submit your closure certification to this office.

If you have any questions regarding this matter, please contact Mr. James J. Mattes at AC 317/232-3404.

Very truly yours,

Thomas E. Linson, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

JJM/lea

cc: Mr. Hak Cho, U.S. EPA, Region V
Mr. Bernie Orenstein, U.S. EPA, Region V

An Equal Opportunity Employer

*Please File
Thanks*



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

105 South Meridian Street

P.O. Box 6015

Indianapolis 46206-6015

Telephone 317-232-8603

August 6, 1987

RECEIVED

AUG 10 1987

U. S. EPA, REGION V
SWB — PMS

Mr. Gregory D. Sautter
Sheller Globe Corporation
4444 North Detroit Avenue
Toledo, OH 43612

Re: Notice of Deficiency
Closure Plan Review
Sheller Goble Corporation
Montpelier, Indiana
IND 006066435

Dear Mr. Sautter:

This letter and enclosure represent the Indiana Department of Environmental Management's first review of the Sheller Globe, Montpelier Plant (IND 006066435), closure plan, which was submitted to us on October 15, 1986.

This closure plan was found to be deficient. Please respond to each item listed in the enclosed Notice of Deficiency and to the comments stated below.

Some of the waste managed in the facility's drum storage areas was listed in the Part A Permit Application as Hazardous Waste No. F017. As of January 16, 1981, the waste number F017 was temporarily suspended and has never been reinstated. These wastes would be hazardous only if they exhibit characteristics of hazardous waste. The deficiency comments enclosed include requests for clarification of the composition of these wastes.

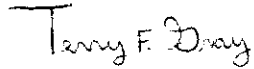
Sheller-Globe has expressed an interest in changing its status from a Transporter/Storage/Disposal (TSD) to a generator only. Before this can be done, all TSD units must be closed. Deficiency #2 mentions a waste pile and a treatment unit at your facility. These units must be closed before your generator only status can be granted.

Sheller Globe Corporation should respond to this NOD by consolidating all their materials and submitting one complete, comprehensive closure plan. Please respond within thirty (30) days of the date of this letter. If you

Mr. Gregory D. Sautter
Page 2

have any questions, please call Mr. Bob Cappiello of my staff at
AC 317/232-3221.

Very truly yours,



Terry F. Gray, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

RJC/rmw

Attachment

cc: Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Mr. Bernie Orenstein, U.S. EPA, Region V

NOTICE OF DEFICIENCY

Sheller-Globe Corporation
Closure Plan Review
Montpelier, Indiana
IND 006066435

1. Closure Performance Standards: 320 IAC 4.1-21-2

Describe how closure minimizes the need for post-closure maintenance and controls, minimizes or eliminates post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or waste decomposition products to the ground, surface water or atmosphere at each unit.

2. Description of Partial and/or Final Closure: 320 IAC 4.1-21-3(a)

Clarify whether or not closure of the drum storage areas constitutes final closure of all treatment, storage and/or disposal (TSD) units at this facility. You must specifically identify the hazardous waste management unit operations which will remain unclosed during the active life of the facility.

A RCRA Inspection Report (dated 10/8/83) and subsequent notices of violations, mentions treatment of spent MDI isocyanate. Provide a detailed chronology on events surrounding this treatment process. Start with dates and description of the treatment process, follow this with dates and description of any enforcement action against you and results of soil analysis, and conclude with what happened to the contaminated soil and what is the present condition of the area.

In addition, the Part A Application dated April 16, 1982, identified a waste pile. Explain in detail the circumstances surrounding this waste pile.

3. Wastes Treated, Removed, or Disposed of Within 90 Days:
320 IAC 4.1-21-4(a)

Revise the closure schedule to show that within 90 days after approval of the plan all wastes in the area being closed will be treated, removed from the site, or disposed on-site.

4. Revision to Closure Cost Estimate: 320 IAC 4.1-22-3(c)

Revise the closure cost estimate to include revisions to the closure plan, which affect the cost of closure. Include requirements noted in this review.

5. Financial Assurance for Closure: 320 IAC 4.1-22-4

Provide a copy of the established financial assurance mechanism for facility closure. The mechanism must be one of the following:

- o closure trust fund: 320 IAC 4.1-22-5
- o surety bond guaranteeing payment into a closure trust fund
320 IAC 4.1-22-6
- o closure letter of credit: 320 IAC 4.1-22-7
- o closure insurance: 320 IAC 4.1-22-8
- o financial test and corporate guarantee for closure:
320 IAC 4.1-22-9
- o multiple financial mechanisms: 320 IAC 4.1-22-10
- o financial mechanisms for multiple facilities: 320 IAC 4.1-22-11

6. Liability Coverage: 320 IAC 4.1-22-24

The owner or operator must maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million. Liability coverage must be maintained until closure certifications are received by the Assistant Commissioner.

A letter from Mr. Gregory Sautter, dated October 15, 1986, stated that Sheller-Globe has not been successful in obtaining environmental liability insurance from a private insurance company. The closure plan cannot be approved until documentation of compliance with liability requirements for sudden accidental occurrences have been provided.

CONTAINER STORAGE AREA COMMENTS

7. Estimate of Maximum Inventory of Hazardous Waste in Container Storage Areas: 320 IAC 4.1-21-3(a)(2)

The closure plan states a total maximum storage inventory of 70 drums total. The closure cost estimate shows a total of 108 drums being disposed. Explain the discrepancy for both Site #1 and #2. Provide supporting calculations for estimated amounts of hazardous wastes, including residues, in storage units and the maximum amount of contaminated soils and residues found in and around those units.

Site #1 - Flammable Liquid Storage Building

Description of Flammable Liquid Storage Building

8. 320 IAC 4.1-21-3

Provide a complete and detailed physical description of the storage building, including the type of construction materials, so that the testing, removal, and decontamination procedures can be judged to be adequate. Be sure to demonstrate that the soils under or around this building have not been contaminated. Contamination can occur through cracks in the floor of the building or cracks or holes in the foundation. If this cannot be demonstrated, soil samples need to be taken around the building. Follow the same procedures as described under point No. 11.

Methods for Sampling and Testing and Decontamination Procedures:
320 IAC 4.1-21-5

Specify the method used to decontaminate the inside of this building and all equipment that is used such as steam cleaning or flushing with appropriate solvent. Cleaning agents or solvents must be clearly identified. Indicate whether the cleaning agent or solvent is suitable for the types of wastes stored. Describe how contaminated cleaning agents or solvents will be properly managed as hazardous wastes.

Specify how cleaning equipment, such as brushes, will be decontaminated or properly disposed of as hazardous wastes.

Specify how you plan to insure that no contamination remains on the ceiling, walls or floors of the container storage building. These areas must be rinsed and the rinsate must be analyzed for contamination. Provide us with your procedures for removing contaminated waste residues and your methods for sampling and testing. Specify the compounds you will be analyzing for and the SW 846 methods you will be using.

Site #2 - Outside Container Storage area.

10. Description of Hazardous Waste Drum Storage Area: 320 IAC 4.1-21-3

Provide a complete and detailed physical description of this storage area. Pictures taken of this area during an inspection in 1985, show a dirt/gravel area while an inspection in June of 1987, show a concrete pad. If this is the case, state if any soil samples were taken under the pad before the concrete was poured.

11. Methods for Sampling and Testing: 320 IAC 4.1-21-5

Soil samples must be taken in the area. To assist you, we have attached a document entitled "Guidelines for Sampling and Analysis Plans" prepared by this office. SW 846, Section 1.1, Sampling and Solid Waste also explains the procedures you should use. Background samples must be taken. Explain the rationale behind decisions that you make.

1. Specify the sampling procedures and demonstrate that the number of samples (including background samples) is sufficient. Indicate how samples are judged to be representative. Sampling two feet from the edge of the storage area, as you specified in the closure plan, is not a viable sample on its own.
2. Specify what compounds the soil samples will be analyzed for and specify which SW 846 method will be used.
3. If contamination is found, soils must be removed until all background levels are met. Describe how these soils will be removed.
4. The wall next to the drum storage area must also be decontaminated. Specify how you intent to do this. Explain the rationale behind any decision that you make. Specify the compounds you will be analyzing for and the SW 846 methods you will be using.

IND 006066 435



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

RECEIVED

JUN 04 1987

OWD - AID
U.S. EPA REGION V

May 29, 1987

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

Hartford City News-Times
123 South Jefferson Street
Hartford City, IN 47348

Re: Public Notice of Closure

Dear Sir or Madam:

I have enclosed a copy of our public notice of closure for the Sheller-Globe Corporation. Please publish this notice, one time, no later than June 19, 1987.

Please provide me with a notarized form and clippings showing the date of publication. All charges should be billed to the Department of Environmental Management, Office of Solid and Hazardous Waste Management. If a separate invoice is sent, be sure to include the publication date of the notice on the invoice.

Your timely attention to this matter is greatly appreciated.

Very truly yours,

Thomas L. Russell

Thomas L. Russell, Interim Chief
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

RJC/ram

Enclosure

cc: Ms. Nancy Maloley (with enclosure)
Mr. David Wagner (with enclosure)
Mr. Wayne Penrod (with enclosure)
Ms. Lisa Kobe (with enclosure)
Mr. Hak Cho, U.S. EPA, (with enclosure)
Ms. Clara Farrow (with enclosure)
Mr. Bernie Orenstein, U.S. EPA, Region V

PUBLIC NOTICE

The Commissioner of the Indiana Department of Environmental Management has received a Closure/Post-Closure plan from Sheller-Globe Corporation, 623 West Monroe Street, Montpelier, IN 47359. The company originally notified the U.S. Environmental Protection Agency as a storer of hazardous waste with the following hazardous waste activity: container storage. The plan proposes the elimination of the following hazardous waste activity: container storage.

Pursuant to 320 IAC 4.1-21, the Commissioner is providing the owner or operator and the public an opportunity to submit written comments on the plan and request modifications of the plan within thirty (30) days of the date of this notice. Corrective action response letters have been sent to the facility to elicit information to ensure that there have been no uncorrected releases concerning hazardous wastes or hazardous waste constituents to the environment from any existing or former solid waste management units. This is to fulfill the U.S. EPA's obligation under the Hazardous and Solid Waste Amendments of November 8, 1984.

The Commissioner can also, in response to a request, hold a public hearing whenever such a hearing might clarify one or more issues concerning the plan or issues involving releases of hazardous waste or hazardous waste constituents from the facility. The Commissioner will give public notice of the hearing at least thirty (30) days before it occurs.

The plan and related background documents are available for inspection and copying by the public at the Indiana Department of Environmental Management, Office of Solid and Hazardous Waste Management, 105 South Meridian Street, Room 901, Indianapolis, Indiana, from 8:15 a.m. to 4:45 p.m., Monday through Friday. The plan is also available at the Montpelier-Harrison Township Public Library, 301 South Main Street, Montpelier, IN 47359.

Persons wishing to comment on the plan should submit such comments in writing to:

Mr. Thomas Russell, Interim Chief
Hazardous Waste Management Branch
Office of Solid and Hazardous Waste Management
Indiana Department of Environmental Management
105 South Meridian Street
Indianapolis, IN 46225

For additional information, contact Mr. Bob Cappiello of my staff at AC 317/232-3221.

RJC/ram

Nak Cho



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

105 South Meridian Street

P.O. Box 6015

Indianapolis 46206-6015

Telephone 317-232-8603

May 19, 1987

Montpelier-Harrison Township Public Library
Attention-Public Notice Director
301 South Main Street
Montpelier, IN 47359

Re: Sheller-Globe Corporation
Closure of a Hazardous Waste
Management Facility
Public Participation

RECEIVED
MAY 26 1987

SOLID WASTE BRANCH
U.S. EPA, REGION V
IND 000606 6-435

Dear Public Notice Director:

On August 30, 1985, the U.S. Environmental Protection Agency published a document titled Guidance on Public Involvement in the RCRA Permitting Program. This guidance document details the requirements for the involvement of the public in the permitting process of hazardous waste management facilities. All treatment, storage, or disposal facilities must have a closure plan that describes in detail the steps necessary to close the facility or portions of the facility in order to minimize exposure to the public and the environment. Facilities which choose not to obtain a hazardous waste treatment, storage, or disposal permit must go through closure. Indiana Rule 320 IAC 4.1-21 provides the regulatory requirements for closure of a hazardous waste management facility. 320 IAC 4.1-21-3(d) requires that we provide the owner or operator and the public the opportunity to comment on and request modifications of such closure plans within 30 days of the date of a newspaper notice.

The following company: Sheller-Globe Corporation, 623 West Monroe Street, Montpelier, IN 47359, has filed a closure plan with our agency. Enclosed is a copy of the closure plan which the above named company has filed. Please make available for public examination this letter and the enclosed information for a period of sixty (60) days.

Montpelier-Harrison Township Public Library
page 2

Thank you for your assistance. If you have any questions concerning closure of this facility or the public participation program, please contact Mr. Bob Cappiello of my staff at AC 317/232-3221.

Very truly yours,

Terry F. Gray

Terry F. Gray, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

RJC/ram

Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V

Mr. Bernie Orenstein, U.S. EPA, Region V

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS

OFFICE MEMORANDUM

DATE: April 4, 1990

TO: RCRA Ground Water File
Sheller GlobeTHRU: Karyl Schmidt KSH-12-90
Harold Templin # 4/10/90FROM: Thomas Greenawalt ~~TLG~~ 4/4/90
Geology SectionSUBJECT: Final Inspection for Closure Certification of Drum Storage Areas at Sheller
Globe's Montpelier, Indiana Facility. IND 006066435

An inspection of drum storage areas at Sheller Globe's Montpelier, Indiana, facility was conducted on March 20, 1990, at 10:00 A.M.. Representing the Indiana Department of Environmental Management (IDEM) were Mr. Phil Perry (Plan Review and Permit Section), Ms. Debra Faulkner (Enforcement Section), and Mr. Thomas Greenawalt (Geology Section). Representing Sheller Globe (now doing business as United Technologies Automotive (UTA)) were Mr. Steve Ridella (UTA-Detroit), Mr. Dean Monroe (UTA-Montpelier), and Mr. Rich Bargenhuff (UTA-Montpelier). The purpose of this inspection was to verify that cleanup-remediation activities were conducted properly in order to certify the closure of three (3) drum storage areas.

Dean Monroe reported that after closure certification is granted, UTA plans to consolidate previous drum storage areas into one in which drums of waste material would be stored less than ninety (90) days.

Storage area No. 1 (concrete block bldg.) is currently being used as a product storage area. All wastes have been removed from the building. The floor appeared clean with no observable stains or cracks. One core sample location was noted on the floor of this storage area.

Storage area No. 2, behind the plant, continues to be used as a waste storage area. At the time of this inspection there were sixteen (16) drums of waste material stored at this location; however, each drum had a date sticker on it indicating that storage was less than ninety (90) days. The floor of this drum storage area appeared to be clean with no noticeable stains. There is one crack in the center of the concrete pad that extends from the front to the rear of this storage area. The crack was sealed with silicone caulk prior to decontamination procedures. Numerous core sample locations were observed, but not all soil sample locations could be verified due to the presence of the drums containing waste materials. Previously, this storage area contained storage racks consisting of 2" diameter pipes that were imbedded into the concrete pad. The pipes were cut off flush with the concrete pad surface when these racks were removed. By doing so, 2" diameter holes extending down into the concrete pad were left open. Phil Perry (IDEM) recommended that these

holes be sealed in order to prevent possible soil contamination and Steve Ridella (UTA) assured us that this would be taken care of as soon as possible. This storage area also contains a drain that extends lengthwise along the rear of the pad and empties into storage tanks. Phil Perry (IDEM) recommended that the drain be sealed and that the storage tanks no longer be used. Both Steve Ridella and Dean Monroe (UTA) concurred with this idea.

The exact location of drum storage area No. 3 could not be determined; however, with the aid of site maps included in the closure plan, an approximate location was defined. No soil discoloration was noticed at this location, however, there was an area of approximately 7' X 7' where no vegetation would grow. Drum storage area No. 3 has been partially covered with a recently constructed crushed stone driveway. Neither of the two soil sample locations could be verified.

A small creek runs along the southern boundary of the facility property. A chain-link fence has been constructed parallel to the creek approximately 10' north of the creekbed. A large tree branch had fallen and damaged a section of this fence. Mr. Monroe stated that the fence would be repaired. A storage drum was observed in the creek behind the Sheller Globe plant. This drum had no markings on it, therefore its' contents remained unknown. In addition, rubber stripping (similar to that used by Sheller Globe) was observed along the creek bank. Mr. Ridella assured us that the drum and the rubber stripping would be removed as soon as possible and that these materials would be disposed of properly.

TG/ssh

cc: Ms. Fayola Wright, U.S. EPA, Region V
Mr. Phil Perry, IDEM
Ms. Debra Faulkner, IDEM
Thomas Greenawalt, IDEM
File 1clb



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

VIA CERTIFIED MAIL - P124-437-410

Mr. Gregory P. Sautter
Manager of Environmental Activities
Sheller Globe Corporation
4444 North Detroit Avenue
Toledo, Ohio 43612

Re: Closure Certification
Sheller Globe Corporation
Montpelier, Indiana
IND 006066435

Dear Mr. Sautter:

The Indiana Department of Environmental Management (IDEM) has received your certification, dated June 26, 1989, that total closure has been completed as outlined in the approved closure plan for the container storage units (S01). With receipt of this certification, total closure is complete as required by 329 IAC 3-21.

Sheller Globe Corporation, Montpelier, Indiana, originally notified the U.S. Environmental Protection Agency (U.S. EPA), Region V, as a hazardous waste storage facility with the following hazardous waste activity: container storage (S01). The closure certification for container storage (S01) indicated that Sheller Globe Corporation's new status is generator. The container storage area will continue to be used for less than ninety (90)-day storage.

During an inspection by IDEM staff on March 20, 1990, several potential problems were noted; however, they do not affect the closure of the hazardous waste units. The first item noted was that a pipe rack had been removed from the outside storage pad, leaving holes in the storage pad. These holes should be sealed to prevent any spillage from contaminating the soil below the pad. Also, there was an unmarked drum floating in the creek south of the building. The content of the drum, if any, was unknown. There was also some rubber molding or stripping in the creek. These items should be removed from the creek and disposed of in the proper manner. Please submit documentation to this office within thirty (30) days from the date of receipt of this letter that these items have been completed.

This is also to notify you that your facility is no longer required by 329 IAC 3-22-4 to maintain financial assurance for the closure of your facility.

An Equal Opportunity Employer

Mr. Gregory P. Sautter

Page 2

If you have any additional questions regarding this matter, please contact Mr. Phil Perry at AC 317/232-3220.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce H. Palin", with a stylized flourish at the end.

Bruce H. Palin
Acting Assistant Commissioner for
Solid and Hazardous Waste Management

PP/bja

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Blackford County Health Department
Mr. Jeff Stevens
Ms. Jenny Dooley
Mr. James Hunt
Mr. Dennis Zawodni



FILE
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

RECEIVED
APR 10 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

April 6, 1989

Mr. Gregory P. Sautter
Manager of Environmental Activities
Sheller Globe Corporation
4444 North Detroit Avenue
Toledo, Ohio 43612

Re: Closure Certification Extension
Sheller Globe Corporation
Montpelier, Indiana
IND 006066435

Dear Mr. Sautter:

The Indiana Department of Environmental Management (IDEM) has received your letter dated January 25, 1989, requesting an extension for decontamination and certification of closure. Upon review of your letter, the Indiana Department of Environmental Management will grant a closure extension until April 30, 1989.

During an inspection of Sheller Globe on March 3, 1989, Mr. Steve Hunter of Indiana Department of Environment Management noted that the container storage areas were still in use. Mr. Hunter also noted that the storage area and pad had been decontaminated sometime in the past, but there is now evidence of leakage/spillage on the pad. Since the storage areas are currently being used and there is evidence of spillage, redecontamination and sampling will be required before closure certification.

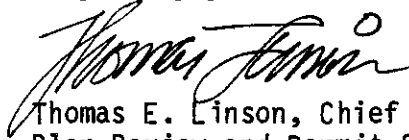
Pursuant to 329 IAC 3-21-4, applicable closure activities must be completed in accordance with the approved closure plan. Furthermore, 329 IAC 3-21-6 requires that a certification, signed by the owner or operator and by an independent registered professional engineer shall be submitted. The certification must be in accordance with 329 IAC 3-34-2 and should include the necessary documentation concerning closure activities.

On or before April 30, 1989, submit your closure certification to this office.

Mr. Gregory P. Sautter
Page 2

If you have any questions regarding this matter, please contact Mr. Phil Perry at AC 317/232-3220.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Thomas E. Linson".

Thomas E. Linson, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fay Wright, U.S. EPA, Region V
Mr. Dennis Zawodni
Mr. Jim Hunt
Mr. Steve Hunter

FILE

Gary



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

RECEIVED
AUG 15 1989
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

Mr. Gregory P. Sautter
Manager of Environmental Activities
Sheller Globe Corporation
4444 North Detroit Avenue
Toledo, Ohio 43612

August 9, 1989

Re: Closure Certification
Sheller Globe Corporation
Montpelier, Indiana
IND 006066435

Dear Mr. Sautter:

The Indiana Department of Environmental Management (IDEM) staff has reviewed the closure certification documents submitted June 26, 1989. This review indicated that the report submitted was inadequate, and that additional information is needed as follows:

1. Submit soil boring logs for samples taken from the drum storage area number 2.
2. Submit information pertaining to the history of the drum storage number 2 prior to 1986 when the area was paved.

In order for this office to adequately review the information submitted, the discrepancies above must be addressed.

If you have any questions in regard to this matter, please contact Mr. Phil Perry at AC 317/232-3220.

Very truly yours,

Linda L. Bobo, Acting Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Mr. Thomas Greenawalt



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

*See Bloch
Please file
Thanks*

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

VIA CERTIFIED MAIL - P395-651-541

June 29, 1988

Mr. Gregory P. Sautter
Manager of Environmental Activities
Sheller-Globe Corporation
4444 North Detroit Avenue
Toledo, Ohio 43612

Re: Modified Closure Plan
Sheller-Globe Corporation
Montpelier
IND 006066435

Dear Mr. Sautter:

The enclosed total closure plan dated October 15, 1986, and December 9, 1987, for two (2) hazardous waste drum storage areas has been approved with the enclosed modifications.

Please note that a general scrap rubber area listed as a waste pile in your Part A submitted April 16, 1982, should be withdrawn as a protective filing.

A public notice of the closure plan was published in the Hartford City News-Times. The public comment period began on the date of publication, June 5, 1987, and ended on July 5, 1987. No comments were received.

Applicable closure activities must be completed in accordance with the approved plan within one hundred eighty (180) days after the date of this approval letter. When closure is completed, the owner or operator must submit to the Commissioner certification in accordance with 320 IAC 4.1-34-2(d) and 4.1-21-6, both by the owner or operator and by an independent registered professional engineer, that the facility has been closed in accordance with the specifications in the approved closure plan. The response must indicate the facility's desired future status. Mail your response and certification to:

Mr. Thomas E. Linson, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management
Department of Environmental Management
105 South Meridian Street
Indianapolis, Indiana 46225

An Equal Opportunity Employer

Mr. Gregory P. Sautter
Page 2

In addition, Section 206 of the Hazardous and Solid Waste Amendments of 1984 (HSWA) requires that corrective actions be performed for all releases of hazardous waste or constituents from any solid waste management unit. A Solid Waste Management Unit is defined as any unit (landfill, waste pile, etc.) that received hazardous waste or constituents and stopped receiving the waste prior to the effective date of RCRA (November 19, 1980). The U.S. Environmental Protection Agency (U.S. EPA) has the authority to implement this provision, therefore, your company may still be subject to HSWA requirements.

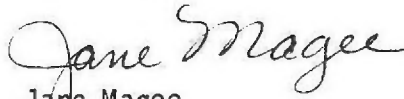
*talked
to
John
7/7/80
to
correct
this*

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review and a petition for a stay of effectiveness. These petitions must be submitted to the IDEM within fifteen (15) days of your receipt of this notice. The petitions must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision, or otherwise entitled to review by law.

The petitions must specifically identify those portions or conditions of the modified closure plan for which a stay and/or administrative review is being requested.

Please direct all questions regarding the closure process to Mr. John Hale of my office at AC 317/232-3220.

Sincerely,



Jane Magee
Assistant Commissioner for
Solid and Hazardous Waste Management

JSH/sac

Enclosures

cc: Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Mr. Bernie Orenstein, U.S. EPA, Region V
Blackford County Health Department (with enclosure)
Mr. Jeff Stevens

Modification of Closure Plan
Sheller-Globe Corporation
Montpelier, Indiana

1. A geology narrative must be submitted within sixty (60) days of receipt of this modified closure plan. A geology narrative is necessary for the purpose of pollution assessment if contamination occurs in the saturated zone. The geology narrative should include a discussion on all available soil data, subsurface geology, ground water aquifer depths, a well survey (to include logs and maps of locations) and any public or private wells in the area and any other pertinent information that would help assess the site. There should also be a map showing the drum storage areas drawn to scale.
2. At site 1, the Inside Storage Area, the concrete floor should be inspected for cracks. If the concrete is cracked, soil samples at each crack should be taken immediately below the concrete floor. The borings should continue with samples at six (6)-inch intervals down to two (2)-feet. These samples should be tested for the stated parameters of the closure plan. The laboratory results should then be sent to the IDEM and reviewed.

If the results indicate contamination underneath the concrete floor of the storage area, the concrete floor should be removed and a grid of sample locations would be required for additional soil samples over the storage area, including a ten (10)-foot perimeter around the storage area.

3. At site 2, the Outside Storage Area, a minimum of fifteen (15) borings should be made initially to a depth of two (2)-feet (samples for analysis gathered at six (6)-inch intervals). A minimum of seven (7) of these points (selected via a random number generator) will also be sampled for analysis at a depth of ten (10)-feet or at the deepest practicable level above the water table, whichever is deeper.
4. At both sites, where any contamination still exists at the ten (10)-foot level, samples should be taken at one (1)-foot intervals thereafter until the extent of contamination is determined. If a shallow water table exists and contamination continues through the soil down to the saturated zone, monitoring wells will be required to determine the extent of the contamination.
5. The soil samples should have U.S.D.A. grain-size estimates done to classify the soil borings in conjunction with the United State Soil Classification System using the modified Wentworth Grain-Size Divisions in the event that such data is required to evaluate the need for ground water monitoring.

6. Samples will be placed in glass containers with teflon-lined septa and cooled to 4° centigrade.
7. Background samples do not have to be taken because all parameters of interest are organics. Inorganic action levels are based on expected, normally-occurring background levels. Since the organic parameters represent chemicals which do not occur naturally, any of these organics found will be considered to be introduced from an outside source. Therefore, the action level for organics is established at the detection limit. Background and other samples may be desirable if Sheller-Globe believes that contamination detected may have migrated from off-site. If background samples are taken, a minimum of four (4) borings are required. Samples from the same soil horizons may be composited prior to analysis (background samples only).
8. The closure plan does not reference analytical methods for parameters of interest. The following methods from SW-846 will be followed:

Toluene	8240
Xylene	8240
Methyl Ethyl Ketone	8240
Methylene Chloride	8010
Di-N-Octyl-Phthalate	8060
Trichlorofluoromethane	8010
1,1,1-Trichloroethane	8010
Oils and Grease (digestion)	3030

For Diphenylmethane Diisocyanate, the following methods will be used:

For Water:

1. Extract sample three (3) times with methylene chloride.
2. Acid fraction cleanup of extract (ph <=2)
3. Base/neutral extraction (ph >=10) concentrate.
4. Analysis by GC for p,p'-Diamino-diphenyl Methane.
Detection limit 1-5 mg/l.

For Soil:

1. Add water to soil sample to break down any neat material present.
2. Extract in a soxhlet apparatus as for water .

9. On page 4, Section D.2.c. should be deleted from this closure plan. It does not address any waste storage areas.
10. On page 5, Section E., paragraph 3 may be deleted. The areas will be washed and triple-rinsed, then used for less than 90-day storage of the same wastes as before.
11. On page 6, Section E.1., the last paragraph may be deleted (see comment No. 10).
12. On page 7, Section E.2., paragraph 6 may be deleted (see comment No. 10).
13. It was found that Sheller-Globe Corporation is presently using two (2) tanks as secondary containment for their outside drum storage area. The two (2) tanks are acting as an oil/water separator, and will continue to be used in this capacity after the drum storage area is closed as a RCRA unit. The following modifications are made concerning the tanks:
 - a. Before storage pad No. 2 is rinsed, the tanks must be drained, sludge removed, and tanks and ancillary equipment must be inspected and integrity certified by a registered professional engineer.
 - b. All materials stored on storage pad No. 2 must be compatible with previously stored materials and with each other.

A.T. Kearney, Inc.
699 Prince Street
P.O. Box 1405
Alexandria, Virginia 22313
703 836 6210

Management
Consultants

RECEIVED

March 17, 1987

MAR 17 1987

ATKEARNEY

Ms. Pat Vogtman
Regional Project Officer
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

SOLID WASTE BRANCH
U.S. EPA, REGION V

Reference: EPA Contract No. 68-01-7038; Work Assignment No.
R05-12-14; Indiana Interim Status Storage Facility
Closure Plan Review; Sheller-Globe Corporation,
Montpelier Plant, Montpelier, EPA ID No. IND
006066435

Dear Ms. Vogtman:

Enclosed please find the Interim Status Closure Plan Review for the Sheller-Globe Corporation facility in Montpelier, Indiana. Sheller-Globe proposes closure of two hazardous waste 55-gallon drum storage areas used for storage of flammable waste solvents from cleaning and paint operations (Area No. 1) and non-flammable wastes including chlorinated solvents, isocyanates, and urethane polyols (Area No. 2). According to the Closure Plan dated Oct. 15, 1986, both sites are presently used as less-than-90 day accumulation areas.

Some of the waste managed in the facility's drum storage areas was listed in their RCRA Part A Permit Application as Hazardous Waste No. F017. As of January 16, 1981, the waste number F017 was temporarily suspended and has never been reinstated. These wastes would be hazardous only if they exhibit characteristics of hazardous waste. The deficiency comments enclosed include requests for clarification of the composition of these wastes, in addition to a more complete technical description of the closure process. No financial assurance information was supplied in the closure plan; according to conversations with IDEM, this facility has been referred to Enforcement regarding financial assurance.


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Ms. Pat Vogtman
Page 2
March 17, 1987

Please note that this closure review reflects the Indiana regulations as revised January 17, 1986, and that recent changes in the Federal regulations are discussed in the "Revisions to Regulations" and "Summary of Changes" sections of this review.

Please call me if you have any questions.

Sincerely,


Mary Thoma Cervera
Technical Director

Enclosure

cc: H. Cho, EPA Region V
T. Gray, IDEM
R. Capiello, IDEM
D. Beasley
K. Breeden
J. Grieve
J. Gers
G. Kline
M. O'Hare
S. Smith, PRA

INDIANA INTERIM STATUS
STORAGE FACILITY
CLOSURE PLAN REVIEW

SHELLER-GLOBE CORPORATION
MONTPELIER, INDIANA

EPA I.D. NO. IND 006066435

Prepared for:

U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Prepared by:

A. T. Kearney, Inc.
699 Prince Street
Alexandria, Virginia 22313

In response to:

EPA Contract No. 68-01-7038
Work Assignment No. R05-12-14

March 17, 1987

Sheller Globe Corporation
Montpelier, Indiana
IND 006066435

Interim Status Closure Plan Review

GENERAL COMMENTS

The deficiency comments enclosed include requests for a more complete technical description of the closure process and updating the schedule for closure and cost estimates. According to the Closure Plan dated October 15, 1986, both sites are presently used as less-than-90-day accumulation areas. Some of the waste managed was listed in the RCRA Part A Permit Application as Hazardous Waste No. F017. As of January 16, 1981, the waste number F017 was temporarily suspended and has never been reinstated. These wastes would be hazardous only if they exhibit characteristics of hazardous waste. The deficiency comments enclosed include requests for clarification of the composition of these wastes, in addition to a more complete technical description of the closure process. No financial assurance information was supplied in the closure plan; according to conversations with IDEM, this facility has been referred to Enforcement regarding financial assurance. Consolidate all information and submit one comprehensive closure plan.

The following sections summarize forthcoming changes to the regulations.

Revisions to Regulations

Be advised that amendments to the state regulations for closure and the associated financial requirements are forthcoming and may become effective by the latter part of calendar year 1987. Further changes to the state regulations concerning hazardous waste storage tanks may become effective in 1988 and will affect closures of these units. The following discussion highlights significant changes to the required content of closure plans.

These changes reflect recent revisions to the Code of Federal Regulations (CFR). Specifically, these revisions were to 40 CFR Subparts G & H as set forth in the Friday, May 2, 1986 Federal Register, 51 FR 16422 and the Monday, July 14, 1986 Federal Register, 51 FR 25422.

Many of the amendments incorporated into the regulations cited above were clarifications of previously undefined terms, and codification of the Agency's interpretative guidance on existing regulations. Therefore, in many cases, the intended content of closure plans did not change. These changes will not be discussed, but can be reviewed in the preambles to those final rules.

The outline presented herein is to be used as a reference to assist in amending or rewriting sections of your closure plans in anticipation of the forthcoming revisions.

The section entitled Closure Plan Requirements for Tank Systems discusses amendments made to the federal regulations in the Monday, July 14, 1986 Federal Register, 51 FR 25422. All other sections discuss amendments made to the federal regulations in the Friday, May 2, 1986 Federal Register, 51 FR 16422.

Summary of Changes

New Definitions: (40 CFR 260.10)

The "active life of a facility" is extended to include the period from the initial receipt of hazardous waste at the facility until the Technical Secretary receives certification of final closure.

The new definition of "partial closure" expands the meaning to include completion of the closure process for a specific hazardous waste management unit at a facility while other units remain in operation. Previously, only closure of a trench, pit or landfill cell was identified as a partial closure, although the term was generally interpreted to include all other hazardous waste management units.

"Final closure" is now clarified to mean completion of the closure process for the last hazardous waste management unit at a facility.

Closure Performance Standards: (40 CFR 265.111)

"Hazardous constituents" replaced "hazardous waste constituents", thereby broadening the owner/operator's responsibility to prove that his plan protects human health and the environment by preventing post-closure escape of hazardous constituents to the ground, surface waters or atmosphere. This redefinition extends testing requirements to toxic constituents listed in 40 CFR 261 Appendix VIII in place of those in Appendix VII.

Closure Plans: (40 CFR 265.112)

Estimate of year of closure: (40 CFR 265.112(b)(7))

Previously, an estimate of the year of final closure was required for all facilities. The new requirement applies only to those facilities using trust funds to demonstrate financial assurance and whose remaining operating life is less than twenty years, or who are under interim status and do not have approved closure plans.

Amendment of plans: (40 CFR 265.112(c)(2))

Previously, plans were to be amended within 60 days of changes in operating plans, facility design or expected year of closure. The new requirement is more stringent, and requires amendments due to planned changes to be submitted 60 days prior to those changes. Unexpected changes still require amendments within 60 days after the changes occur.

Location of plans: (40 CFR 265.112(a))

Previously, closure plans were to be kept at the facility until closure was completed and certified. Owner/operators are now allowed to keep plans at an off-site location, but the plans must be furnished to the Technical Secretary upon request.

Notification of intent to close: (40 CFR 265.112(d)(1))

The new amendments change the deadlines for notification of intent to close. Previously, for facilities with permits or approved closure plans the deadline was 180 days prior to start of closure. The new deadlines for these facilities are as follows:

- o for disposal units; 60 days prior to start of closure.
- o for non-disposal units; 45 days prior to start of closure.

For interim status facilities without approved closure plans the deadline was 180 days prior to start of closure. The revised deadlines for these facilities are as follows:

- o for disposal units; 180 days prior to start of closure.
- o for final closure of non-disposal units; 45 days prior to start of closure.
- o for partial closure of non-disposal units; there is no requirement to notify.

Closure Deadlines

Beginning closure: (40 CFR 265.112(d)(2))

Previously, closure was to begin 30 days after receiving the final volume of any type of wastes. The new requirement now specifies that closure is to begin 30 days after receiving the final volume of hazardous wastes.

Completing closure: (40 CFR 265.113(b))

Again, the deadline for completion of closure is clarified to be within 180 days after receiving the final volume of hazardous waste.

Closure Certification: (40 CFR 265.115)

The existing requirement that certification of closure be made both by an independent registered professional engineer and the owner/operator is retained. A deadline is set requiring submission of certifications within 60 days of completion of partial closure of disposal units and of final closure. There is no requirement to certify partial closure of non-disposal units. A requirement that all certifications be submitted by registered mail is added.

Closure Cost Estimates

Revisions due to facility operations changes: (40 CFR 265.142(a)(3))

The new regulation requires revisions of cost estimates within 30 days of approval of modified permit and closure plan if an increase in costs resulted.

Adjustments for inflation: (40 CFR 265.142(b))

Previously, estimates were to be adjusted for inflation within 30 days after the anniversary date of preparation of the first estimate. The new requirement sets two deadlines:

- o for owner/operators using the financial test or corporate guarantee the deadline for adjustments is within 30 days after the close of the firm's fiscal year.
- o for owner/operators using other financial instruments the deadline for adjustments is 60 days prior to the anniversary date of establishment of the financial instruments.

Financial Responsibility

End of liability coverage period: (40 CFR 265.147(3))

Previously, the coverage period ended when certification of closure was received by the Technical Secretary. Now, the coverage period must continue until the Technical Secretary gives written notification that coverage can be terminated. Notification must occur within 60 days after certification of closure unless the Technical Secretary has reservations. These reservations must be provided to the owner/operator as a detailed written statement.

Change of ownership: (40 CFR 270.72(d))

A deadline is established requiring that new owner/operators demonstrate financial assurance within six months of assuming ownership.

Closure Plan Requirements for Tank Systems

"Tank system" definition: (40 CFR 265.197(a))

The definition is expanded to include the entire tank system, not just the tank. Inclusion of the tank's ancillary equipment and containment system is consistent with the original intent of the regulations.

Contaminated soils: (40 CFR 265.197(a))

Removal or decontamination requirements are expanded to include contaminated soils. The new requirement is consistent with the original intent of the regulations.

Circumstances under which a tank must be closed as a landfill:

(40 CFR 265.197(b))

This requirement clarifies that if it is not practicable to remove or decontaminate all contaminated soils at closure, then the owner/operator must meet the requirements for final capping and ground water monitoring as set forth in 40 CFR 265.310. This clarification is consistent with the original intent to prevent the potential for an unmanaged hazardous waste release after closure.

Requirement to submit contingent closure plans:

(40 CFR 265.197(c)(1)(2))

Regulations now require the owner/operator of tank systems without secondary containment to prepare contingent closure and post-closure plans in order to

ensure that they have adequately planned for the possibility of closing as a landfill. The new regulation requires initial submission of two closure plans, one to cover each case.

Cost estimates: (40 CFR 265.197(c)(3))

The new regulation adds the requirement that cost estimates must reflect the costs of complying with contingent closure and post-closure plans if these are greater than closure plan costs.

Financial assurance: (40 CFR 197(c)(4))

The new regulation adds the requirement that financial assurance must also be based on the greater costs; whether for closure as a tank or as a landfill.

Sheller-Globe Corporation
Montpelier, Indiana
IND 006066435

Interim Status Closure Plan Review

SPECIFIC COMMENTS

I. General Closure Requirements: 40 CFR 265 Subpart G; 320 IAC 4.1 Rule 21

I.A Closure Performance Standards: 40 CFR 265.111; 320 IAC 4.1-21-2

Describe how closure minimizes the need for post-closure maintenance and controls, minimizes or eliminates post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or waste decomposition products to the ground, surface water or atmosphere at each unit.

I.B Contents of Closure Plan

I.B-1 Description of Partial and/or Final Closure: 40 CFR 265.112(a); 320 IAC 4.1-21-3(a)

Provide a more complete technical description of the closure process for the facility. Clarify whether or not closure of the drum storage areas constitutes final closure of treatment, storage and/or disposal (TSD) units at this facility. A RCRA Inspection Report (Ref. 3) mentions treatment of spent MDI isocyanate. In addition, the Part A application identified a waste pile. Although the RCRA inspection report did not mention a waste pile, verify whether there is a waste pile or if there ever was one. If TSD units other than the drum storage areas will remain in operation, the closure plan must include proposals for final closure of these units as well. If they no longer exist, document that they were properly closed.

The closure plan must include enough information such that: (1) the reasoning behind and procedures for partial and final closure are understandable; (2) the schedules can be justified; (3) cost estimates can be justified; (4) partial closure plans can be determined to be consistent with overall facility closure plan; and (5) financial assurance can be judged to be adequate.

I.B-2 Maximum Extent of Operation: 40 CFR 265.112(a)(1); 320 IAC 4.1-21-3(a-1)

To ensure that the final closure plan is comprehensive, the plan must specifically identify the maximum extent of hazardous waste management unit operations which will remain unclosed during the active life of the facility. Include identification of the unit used for treatment of spent MDI isocyanate and the waste pile.

I.B.-3 Estimate of Maximum Inventory of Wastes: 40 CFR 265.112(a)(2); 320 IAC 4.1-21-3(a-2)

Describe more specifically the types of hazardous wastes in storage at the facility. Clarify not-otherwise-specified liquid hazardous waste. In addition, specify the volume and type of wastes in treatment or in waste piles at any time during the life of the facility. The closure plan states a maximum inventory of 70 drums total. The closure cost estimate shows a total of 108 drums being disposed. Explain the discrepancy.

Provide supporting calculations for estimated amount of hazardous wastes, including residues, in all treatment and storage units and the maximum amount of contaminated soils and residues found in and around those units.

I.B-4 Description of Decontamination and Removal of Hazardous Waste and Residues: 40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5

Section D.2 of the closure plan states that "all waste material in the storage area shall be consolidated by placing compatible material in proper drums, i.e., non-halogenated solvent with non-halogenated solvent, etc." This indicates that wastes are not currently drummed. Clarify the status of storage of wastes in the storage areas, i.e., whether drummed or not.

Provide a description of the criteria for determining the extent of decontamination necessary to satisfy the closure performance standard, methods for sampling and testing surrounding soils, and procedures for cleaning equipment and removing contaminated soils, and methods for properly disposing of contaminated wastes, residues, and soils.

I.B-5 Estimate of Year of Closure and Schedule of Closure: 40 CFR 265.112(a)(4); 320 IAC 4.1-21-3(a-4)

Provide the date of closure and a schedule for final closure, including each hazardous waste management unit (i.e., drum storage area, spent MDI isocyanate treatment unit, waste pile) and final closure of the facility.

I.B-7 Closure Plan Submission 180 Days Before Beginning Closure: 40 CFR 265.112(c); 320 IAC 4.1-21-3(c)

Provide in the revised closure schedule that closure will begin no less than 180 days after the revised closure plan is submitted to the Technical Secretary.

- I.C-1. Wastes Treated, Removed, or Disposed of Within 90 Days and Extensions of Time Period:
40 CFR 265.113(a); 320 IAC 4.1-21-4(a)

The closure schedule shows that the waste inventory from the drum storage areas will be removed/disposed within 90 days. However, if other TSD units (i.e., spent MDI isocyanate treatment unit, waste pile) will remain in operation, they also must be included in the closure schedule. Identify the final volume of waste (i.e., drum storage areas, spent MDI isocyanate treatment unit, or waste pile). Revise the closure schedule to show that within 90 days of receiving the final volume of waste, or 90 days after approval of the plan, whichever is later, all wastes will be treated, removed from the site, or disposed on-site.

- I.C-2 Closure Completed Within 180 Days and Extensions of Time Period: 40 CFR 265.113(b); 320 IAC 4.1-21-4(b)

The closure schedule shows that closure of the drum storage area will be completed within 180 days. However, if other TSD units will remain in operation, they also must be included in the closure schedule. Identify the final volume of waste (see I.C-1). Revise the closure schedule to show that closure will be completed within 180 days after receipt of the final volume of waste, or within 180 days after approval of the closure plan, whichever is later.

- I.D Certification of Closure: 40 CFR 265.115; 320 IAC 4.1-21-6

The closure plan must state that documentation supporting the closure certification will be retained and furnished to the Technical Secretary upon request.

- I.E Closure Cost Estimate

- I.E-3 Revisions to Closure Cost Estimate: 40 CFR 265.142(c); 320 IAC 4.1-22-3(c)

Revise the closure cost estimate to include revisions to the closure plan, such as closure for the treatment unit and the waste pile, which affect the cost of closure. Include requirements noted in this review.

I.F Financial Assurance for Closure: 40 CFR 265.143; 320 IAC
4.1-22-4

Provide a copy of the established financial assurance mechanism for facility closure. The mechanism must be one of the following:

- o closure trust fund: 265.143(a)
- o surety bond guaranteeing payment into a closure trust fund 265.143(b)
- o closure letter of credit: 265.143(c)
- o closure insurance: 265.143(d)
- o financial test and corporate guarantee for closure: 265.143(e)
- o multiple financial mechanisms: 265.143(f)
- o financial mechanisms for multiple facilities: 265.143(g)

I.G Liability Coverage: 40 CFR 265.147; 320 IAC 4.1-22-24

The owner or operator must maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million. Liability coverage must be maintained until closure certifications are received by the Technical Secretary.

A letter from Mr. Gregory Sautter (October 15, 1986) (Ref. 2) stated that Sheller globe has not been successful in obtaining environmental liability insurance from a private insurance company. The closure plan can not be approved until documentation of compliance with liability requirements for sudden accidental occurrences have been provided. Perhaps Sheller-Glove should request a variance for liability coverage from the Technical Secretary (reference 320 IAC 4.1-22-24(c)).

II. Closure of Container Storage Area: 40 CFR Subpart G; 320 IAC
4.1 Rule 21

II.B Content of Closure Plan

II.B-1 Detailed Description of Steps Necessary to Close Container Storage Area: 40 CFR 265.112(a); 320 IAC 4.1-21-3(a)

Provide a more complete detailed technical description of the closure process such that: (1) the reasoning behind and

procedures for closure are understandable; (2) the schedule can be justified; (3) closure cost estimates can be substantiated; and (4) financial assurance can be judged to be adequate.

II.B-2 Identification of Maximum Extent of Operation of the Container Storage Area: 40 CFR 265.112(a)(1); 320 IAC 4.1-21-3(a-1)

Provide a complete and detailed physical description of the storage areas, including the type of construction materials, so that the testing, removal, and decontamination procedures can be judged to be adequate. A site map, drawn to scale, should be included.

I.B-3 Estimate of Maximum Inventory of Hazardous Waste in Container Storage Area: 40 CFR 265.112(a)(2); 320 IAC 4.1-21-3(a-2)

Describe more specifically the types of hazardous wastes in storage at the facility. Clarify not-otherwise-specified liquid hazardous waste. In addition, specify the volume and type of wastes in treatment at any time during the life of the facility. The closure plan states a maximum inventory of 70 drums total. The closure cost estimate shows a total of 108 drums being disposed. Explain the discrepancy.

Provide supporting calculations for estimated amounts and storage units and the maximum amount of contaminated soils and residues found in and around those units.

II.B-4 Description of Steps Necessary for Decontamination and Removal of Hazardous Wastes and Residues

II.B-4a Detailed Description of Removal of Waste Inventory: 40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5

Specify the disposition of the waste inventory in containers at the time of closure. Include: (1) the quantity of wastes sent off-site; (2) time required to move the wastes off-site; (3) distance to the final Treatment, Storage or Disposal Facility (TSDF); (4) description of disposal methods at final TSDF; and (5) operating status of the final TSDF (i.e., interim status or permitted facility).

II.B-4b Criteria for Determining the Extent of Decontamination Necessary: 40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5

Specify the criteria to be used to judge the extent of decontamination necessary. This will generally be either on the basis of detection of, or of specific concentrations for the appropriate hazardous wastes or constituents.

II.B-4c

Procedures for Cleaning Equipment and Structures and Removing Contaminated Soils: 40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5

Specify the equipment decontamination procedures, such as steam cleaning or flushing with appropriate solvent. Cleaning agents or solvents must be clearly identified. Indicate whether the cleaning agent or solvent is suitable for the types of wastes stored. Describe how contaminated cleaning agents or solvents will be properly managed as hazardous wastes.

Specify how cleaning equipment, such as brushes, will be decontaminated or properly disposed of as hazardous wastes.

Describe how contaminated soils will be removed from the surrounding area. Provide a detailed description of the steps including, but not limited to, procedures for removing contaminated soils, and methods for sampling and testing surrounding soils.

II.B-4d

Detailed Description of Removal of Waste Residues: 40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5

Provide a detailed description of the steps needed to remove or decontaminate all hazardous waste residues during closure, including, but not limited to, procedures for removing contaminated waste residues; and methods for sampling and testing. Indicate how and where the contaminated container residues are to be disposed. Include the following: 1) the quantity of contaminated waste residues to be sent off-site; 2) time required to remove the waste residues off-site; 3) distance to the final Treatment, Storage, and Disposal Facility (TSDF); 4) description of treatment or disposal methods at the final TSDF; and 5) operating status of the facility (i.e., interim status or permitted facility).

II.B-4e

Methods for Sampling and Testing to Demonstrate Success of Decontamination: 40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5

Specify a testing program to determine if the standard of decontamination has been met. The testing program must include a description of sampling procedures, test parameters, and analytical methods.

Specify the sampling procedures and demonstrate that the number of samples is sufficient. Indicate how samples are judged to be representative.

Demonstrate that the testing parameters are consistent with those selected as criteria for decontamination. They must be indicative of the wastes stored at the container storage area.

Identify analytical methods for each parameter. Methods from SW-846 normally are used. A justification must be provided for any analytical methods specified other than those in SW-846.

Facility Name Sheller-Globe Corporation Montpelier
Plant
 ID Number IND 006066435

INTERIM STATUS CLOSURE PLANS
 [40 CFR PART 265; 320 IAC 4.1-15 THROUGH 4.1-32]
 (Revised as of July 1, 1985; Revised as of Jan. 17, 1986)

	<u>Provided (Y/N) or NA</u>	<u>Adequate (Y/N)</u>	<u>Reference</u>	<u>Comments</u>
I. <u>GENERAL CLOSURE REQUIREMENTS</u> [40 CFR 265 SUBPART G; 320 IAC 4.1 RULE 21]				
A. Closure performance standards [40 CFR 265.111; 320 IAC 4.1-21-2]	<u>N</u>	<u> </u>	<u> </u>	<u>See Comment I.A</u>
B. Content of Closure Plan				
B-1. Description of partial and/or final closure [40 CFR 265.112(a); 320 IAC 4.1-21-3(a)]	<u>Y</u>	<u>N</u>	<u>2</u>	<u>See Comment I.B-1</u>
B-2. Maximum extent of operation [40 CFR 265.112(a)(1); 320 IAC 4.1-21-3(a-1)]	<u>Y</u>	<u>N</u>	<u>2 (p.2)</u>	<u>See Comment I.B-2</u>
B-3. Estimate of maximum inventory of wastes [40 CFR 265.112(a)(2); 320 IAC 4.1-21-3(a-2)]	<u>Y</u>	<u>N</u>	<u>2 (p.1)</u>	<u>See Comment I.B-3</u>
B-4. Description of decontamination and removal of hazardous waste and residues [40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5]	<u>Y</u>	<u>N</u>	<u>2(pp. 2,3)</u>	<u>See Comment I. B-4</u>

Facility Name Sheller-Globe Corporation Montpelier
Plant
 ID Number IND 006066435

	<u>Provided (Y/N) or NA</u>	<u>Adequate (Y/N)</u>	<u>Reference</u>	<u>Comments</u>
B-5. Estimate of year of closure and schedule of closure [40 CFR 265.112(a)(4); 320 IAC 4.1-21-3(a-4)]	<u>Y</u>	<u>N</u>	<u>2 (p.7)</u>	<u>See Comment I.B-5</u>
B-6. Amendment of plan [40 CFR 265.112(b); 320 IAC 4.1-21-3(b)]	<u>NA</u>			
B-7. Closure plan submission 180 days before beginning closure [40 CFR 265.112(c); 320 IAC 4.1-21-3(c)]	<u>N</u>			<u>See Comment I.B-7</u>
C. Time Allowed for Closure				
C-1. Wastes treated, removed, or disposed of within 90 days and extensions of time period [40 CFR 265.113(a); 320 IAC 4.1-21-4(a)]	<u>Y</u>	<u>N</u>	<u>2 (p.7)</u>	<u>See Comment I.C-1</u>
C-2. Closure completed within 180 days and extensions of time period [40 CFR 265.113(b); 320 IAC 4.1-21-4(b)]	<u>Y</u>	<u>N</u>	<u>2 (p.7)</u>	<u>See Comment I.C-2</u>
D. Certification of closure [40 CFR 265.115; 320 IAC 4.1-21-6]	<u>Y</u>	<u>N</u>	<u>2 (p.3)</u>	<u>See Comment I.D</u>
E. Closure Cost Estimate				
E-1. Cost estimate when closure is most expensive [40 CFR 265.142(a); 320 IAC 4.1-22-3(a)]	<u>Y</u>	<u>Y</u>	<u>2 (p.5)</u>	

Facility Name Sheller-Globe Corporation Montpelier
Plant
 ID Number IND 006066435

	<u>Provided (Y/N) or NA</u>	<u>Adequate (Y/N)</u>	<u>Reference</u>	<u>Comments</u>
E-2. Adjustments for inflation [40 CFR 265.142(b); 320 IAC 4.1-22-3(b)]	NA			
E-3. Revisions to closure cost estimate [40 CFR 265.142(c); 320 IAC 4.1-22-3(c)]	N			See Comment I.E-3
F. Financial assurance for closure [40 CFR 265.143, 320 IAC 4.1-22-4]	N			See Comment I.F
G. Liability coverage [40 CFR 265.147; 320 IAC 4.1-22-24]	N			See Comment I.G

Unit Name or Location Drum Storage Areas 1 and 2
 Facility Name Sheller-Globe Corporation Montpelier
Plant
 ID Number IND 006066435

	Provided (Y/N) or NA	Adequate (Y/N)	Reference	Comments
<u>II. CLOSURE OF CONTAINER STORAGE</u>				
AREA [40 CFR 265 Subpart G; 320 IAC 4.1 Rule 21]				
A. Closure performance standards for container storage area [40 CFR 265.111; 320 IAC 4.1-21-2]				
(Address this item under Section I A.)				
B. Content of Closure Plan				
B-1. Detailed description of steps necessary to close container storage area [40 CFR 265.112(a); 320 IAC 4.1-21-3(a)]	Y	N	2	See Comment II.B-1
B-2. Identification of maximum extent of operation of container storage area [40 CFR 265.112(a)(1); 320 IAC 4.1-21-3(a-1)]	Y	N	2(p.2)	See Comment II.B-2
B-3. Estimate of maximum inventory of waste in container storage area [40 CFR 265.112(a)(2); 320 IAC 4.1-21-3(a-2)]	Y	N	2 (p.1)	See Comments II.B-3

Unit Name or Location Drum Storage Areas 1 and 2
 Facility Name Sheller-Globe Corporation Montpelier
Plant
 ID Number IND 006066435

	<u>Provided (Y/N) or NA</u>	<u>Adequate (Y/N)</u>	<u>Reference</u>	<u>Comments</u>
B-4. Description of steps necessary for decontamination and removal of hazardous wastes and residues				
B-4a. Detailed description of removal of waste inventory [40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5]	<u>Y</u>	<u>N</u>	<u>2 (p.2)</u>	<u>See Comment II.B-4a</u>
B-4b. Criteria for determining the extent of decontamination necessary [40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5]	<u>Y</u>	<u>N</u>	<u>2 (p.3)</u>	<u>See Comment II.B-4b</u>
B-4c. Procedures for cleaning equipment and structures and removing contaminated soils [40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5]	<u>Y</u>	<u>N</u>	<u>2 (p.3)</u>	<u>See Comment II.B-4c</u>
B-4d. Detailed description of removal of waste residues [40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5]	<u>Y</u>	<u>N</u>	<u>2 (p.3)</u>	<u>See Comment II.B-4d</u>
B-4e. Methods for sampling and testing to demonstrate success of decontamination [40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5]	<u>Y</u>	<u>N</u>	<u>2 (p.3)</u>	<u>See Comment II.B-4e</u>

Unit Name or Location Drum Storage Areas 1 and 2
 Facility Name Sheller-Globe Corporation Montpelier
Plant
 ID Number IND 006066435

	<u>Provided (Y/N) or NA</u>	<u>Adequate (Y/N)</u>	<u>Reference</u>	<u>Comments</u>
B-5. Detailed schedule for closure of container storage area [40 CFR 265.112(a)(4); 320 IAC 4.1-21-3(a)(4)]	<u>Y</u>	<u>Y</u>	<u>2 (p.7)</u>	<u></u>
C. Time Allowed for Closure				
C-1. Wastes from container storage area treated, removed, or disposed of within 90 days and extensions of time period [40 CFR 265.113(a); 320 IAC 4.1-21-4(a)]	<u>Y</u>	<u>Y</u>	<u>2 (p.7)</u>	<u></u>
C-2. Closure of container storage area completed within 180 days and extensions of time period [40 CFR 265.113(b); 320 IAC 4.1-21-4(b)]	<u>Y</u>	<u>Y</u>	<u>2 (p.7)</u>	<u></u>

References

- 1) RCRA Part A Permit Application, 4/16/82
- 2) Closure Plan, 10/15/86
- 3) RCRA Compliance Inspection Report, 10/8/85
- 4) Letter to D. Schumacker, Sheller-Globe, from
T. Russell, IDEM, 10/21/86 (re: RCRA Facility Inspection Notice of
Inadequacy)
- 5) Letter to D. Schumacker, Sheller-Globe, from
G. Oliver, IDEM, 8/8/86 (re: Request for Disposal of
Lubricant-contaminated Soils from Sheller-Globe Rubber Products
Division)

Facility Name Sheller-Globe Corporation Montpelier
Plant
 ID Number IND 006066435

Provided Adequate
 (Y/N) or NA (Y/N) Reference Comments

III. CLOSURE OF TANK STORAGE UNIT [40 CFR
 265 Subpart G; 320 IAC 4.1 Rule 21]

A. Closure performance standards
 for tanks [40 CFR 265.111;
 320 IAC 4.1-21-2]

(Address this item under Section I A.)

B. Content of Closure Plan

B-1. Detailed description of steps
 necessary to close tank [40 CFR
 265.112(a); 320 IAC 4.1-21-3(a)]

NA

B-2. Identification of maximum extent
 of tank storage operation [40 CFR
 265.112(a)(1); 320 IAC 4.1-21-3(a-1)]

NA

B-3. Estimate of maximum inventory
 of waste in tank [40 CFR 265.112
 (a)(2); 320 IAC 4.1-21-3(a-2)]

NA

B-4. Description of steps necessary
 for decontamination

B-4a. Criteria for determining the extent
 of decontamination necessary
 [40 CFR 265.112 and 265.114;
 320 IAC 4.1-21-3 and 4.1-21-5]

NA

Facility Name Sheller-Globe Corporation Montpelier
Plant
 ID Number IND 006066435

	Provided (Y/N) or NA	Adequate (Y/N)	Reference	Comments
B-4b. Procedures for cleaning equipment and structures and removing contaminated soils [40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5]	NA			
B-4c. Methods for sampling and testing to demonstrate success of decontamination [40 CFR 265.112 and 265.114; 320 IAC 4.1-21-3 and 4.1-21-5]	NA			
B-5 Detailed schedule for closure of tank storage unit [40 CFR 265.112(a)(4); 320 IAC 4.1-21-3(a-4)]				
C. Time Allowed for Closure				
C-1. Wastes from tank treated, removed, or disposed of within 90 days and extensions of time period [40 CFR 265.113(a); 320 IAC 4.1-21-4(a)]	NA			
C-2. Closure of tank completed within 180 days and extensions of time period [40 CFR 265.113(b); 320 IAC 4.1-21-4(b)]	NA			

Facility Name	Sheller-Globe Corporation Montpelier
	Plant
ID Number	IND 006066435

H. Removal of Hazardous Waste and Hazardous Waste Residues

H-1. Detailed description of removal of waste inventory [40 CFR 265.197; 320 IAC 4.1-24-5]

NA

H-2. Detailed description of removal of hazardous waste residues [40 CFR 265.197; 320 IAC 4.1-24-5]

NA

STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



INDIANAPOLIS, 46225

105 South Meridian Street

October 2, 1986

VIA CERTIFIED MAIL

Mr. Thomas A. Dixon
Attorney-at-Law
Eastman and Smith
800 United Savings Building
Toledo, Ohio 43604-1141

Re: Sheller-Globe Corporation
Financial Assurance
EPA I.D. No. IND 006066377 Union City
IND 005380381 Grabill
IND 006066559 Portland
IND 006066435 Montpelier
IND 079589628 Muncie

Dear Mr. Dixon:

This Office is in receipt of your letter dated September 9, 1986, regarding Sheller-Globe's inability to meet the financial test for liability coverage as of June 11, 1986, for the above-referenced facilities. Rule 320 IAC 4.1-22-34 requires that Sheller-Globe Corporation continuously provide this liability coverage until certification of closure.

This Office will be looking at the following criteria in order to determine whether a good faith effort to obtain replacement insurance has been made:

1. Did the company submit a complete application to the insurance carriers in a timely fashion? That is, did the company allow sufficient time for the insurance firms to process and issue the policy.
2. Did the company submit applications to at least several known suppliers of Environmental Impairment Liability coverage?
3. Did the company have prepared a risk assessment and submit same to insurance carrier along with its application?

Sheller-Globe needs to demonstrate its good faith effort through careful and thorough documentation of each step it has taken to seek insurance. This should include documentation of all contacts made and the reasons given by the insurance companies for denying or delaying the applications. Please provide copies of all correspondence with the insurance companies involved.

EASTMAN & SMITH

ATTORNEYS AT LAW

800 UNITED SAVINGS BUILDING
TOLEDO, OHIO 43604-1141

TELEPHONE (419) 241-6000
TELECOPIER (419) 241-5568

DONALD E. THEIS
BARRY W. FISSEL
THOMAS A. DIXON
THERESE V. KAURICH
JOHN D. WILLEY, JR.
MARTIN S. HALL
RICHARD L. BERRY, JR.
GARY M. HARDEN
JUDITH K. RUUD
JOSEPH A. GREGG
STEPHEN R. SERRAIND
RONALD J. TICE
JOHN J. MCGDOWAN, JR.
STEVEN D. REINBOLT
STUART J. GOLDBERG
THOMAS J. GIBNEY

JOHN R. EASTMAN
HOWARD M. FRIEDMAN
OF COUNSEL

MELVIN R. BERGMAN
RETIRED

JAMILLE G. JAMRA
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FREDERIC E. WOLF
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FRANK D. JACDBS
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JAMES F. NODNEY
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MORTON BOBOWICK
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JOHN T. LANDWEHR
DAVID L. KUHLE
RICHARD T. SARGEANT
KENNETH C. BAKER
ROBERT J. GILMER, JR.
PETER R. CASEY III
DAVID F. COOPER
RUDOLPH A. PECKINPAUGH, JR.

December 23, 1985

Regional Director
U.S. Environmental Protection Agency
Attention: RCRA Financial Requirements
Box A3587
Chicago, IL 60690-3587

Re: Sheller-Globe Corporation Financial Assurance

To Whom It May Concern:

Please find enclosed a letter from the Chief Financial Officer of Sheller-Globe Corporation in support of that firm's use of the financial test to demonstrate financial assurance for closure care and for liability for sudden accidental occurrences. If you have any questions with regard to this matter, please do not hesitate to contact the undersigned.

Very truly yours,

EASTMAN & SMITH

Thomas A. Dixon

Thomas A. Dixon

TAD/dll
Enclosures

FEDERAL EXPRESS



SHELLER-GLOBE

December 23, 1985

Regional Director
U.S. Environmental Protection Agency
Attention: RCRA Financial Requirements
Box A3587
Chicago, IL 60690-3587

Re: Sheller-Globe Corporation: Financial Assurance

To Whom It May Concern:

I am the chief financial officer of Sheller-Globe Corporation, an Ohio corporation with principal offices at 1505 Jefferson Avenue, Toledo, Ohio, 43624. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

<u>Facility</u>	<u>E.P.A. I.D. Number</u>
<u>REGION IV</u>	
Kosciusko Plant No. 1 Superior Drive Kosciusko, Mississippi 39090	MSD008168536
Verona Plant Lee Industrial Park P.O. Box 547 Verona, Mississippi 38879	MST000648329

Regional Director
U.S. Environmental Protection Agency
December 23, 1985
Page 2

<u>Facility</u>	<u>E.P.A. I.D. Number</u>
<u>REGION V</u>	
City Auto Stamping Plant Lint & Dura Avenues Toledo, Ohio 43612	OHD018354894
Globe-Weis Wauseon Division Linfoot and Bayes P.O. Box 398 Wauseon, Ohio 43567	OHD005037569
Hardy Division 1225 West Pearl Street P.O. Box 109 Union City, Indiana 47390	IND006066377
Muncie Plant 1700 Macedonia Muncie, Indiana 47302	IND079589628
Portland Division 210-510 S. Bridge Street Portland, Indiana 47371	IND006066559
Montpelier Plant 623 West Monroe Street Montpelier, Indiana 47359	IND006066435
Niles Plant 1501 South Third Street Niles, Michigan 49120	MID082859315
Norwalk Assembly Plant 55 North Garfield Street Norwalk, Ohio 44857	OHD039999164
Grabill Plant P.O. Box 500 Grabill, Indiana 46741	IND005380381
Quincy Plant 130 Jersey Street Quincy, Illinois 62301	ILD096717673

Regional Director
U.S. Environmental Protection Agency
December 23, 1985
Page 3

<u>Facility</u>	<u>E.P.A. I.D. Number</u>
Technical Center 444 North Detroit Avenue P.O. Box 6768 Toledo, Ohio 43612	OHD063717565

REGION VII

Keokuk Plant 3200 Main Street Keokuk, Iowa 52632	IAD005136023
Iowa City Plant 2500 Highway #6 East Iowa City, Iowa 52240	IAD006537237

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

<u>Facility</u>	<u>E.P.A. I.D. Number</u>	<u>Closure Cost Estimates</u>
<u>REGION V</u>		
Niles Plant 1501 South Third Street Niles, Michigan 49120	MID082859315	\$74,360.00
<u>REGION VII</u>		
Keokuk Plant 3200 Main Street Keokuk, Iowa 52632	IAD005136023	\$70,825.00
Iowa City Plant 2500 Highway #6 East Iowa City, Iowa 52240	IAD006537237	\$75,140.00

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or

IND 006066 435

5HE-12

OCT 25 1985

Thomas Russell, Chief
Enforcement Section
Indiana State Board of Health
1330 West Michigan Street
Indianapolis, Indiana 46206-1964

Re: First State Insurance Company
Policy # 949187 - Cancellation

Dear Mr. Russell:

The enclosed letter dated October 8, 1985, was submitted to the United States Environmental Protection Agency (U.S. EPA) by the Cameron and Colby Company, Incorporated. This letter is a notice of insurance cancellation for the facilities identified in the October 8th letter. Please investigate this information and pursue any appropriate State compliance activity to assure that the facilities have demonstrated adequate financial assurance.

If you have any questions, please contact Ms. Zetta Thomas of my staff at (312) 886-4555.

Sincerely yours,

Joseph M. Boyle, Chief
IL/IN Unit
RCRA Enforcement Section

Enclosure

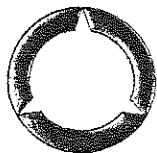
10/24/85	10/24/85	10/24/85	10/24/85	10/24/85	10/24/85	10/24/85	10/24/85	10/24/85
----------	----------	----------	----------	----------	----------	----------	----------	----------

cc: Jeffery Stevens, Attorney (ISBH)

bcc: Pat Vogtman

5HE-12:Zetta:lr:6-4555:10/24/85

**Cameron
and Colby Co.**
INCORPORATED



AN OPEN CIRCLE COMPANY

October 8, 1985
Chicago

RECEIVED

OCT 9 1985

EPA REGION 5
OFFICE OF REGIONAL
ADMINISTRATION

EPA Region V
230 S. Dearborn
Chicago, IL 60604

Re: See Attached List

To Whom It May Concern:

Please be advised that this contract with First State Insurance Company Policy No. 949187 was cancelled on October 1, 1984 and coverage for sudden and accidental pollution has not been extended. It is understood that this notice has been delayed and you require 30 days from your receipt of this letter for it to take place. However, we have been advised that a replacement carrier has been at risk since October 1, 1984.

Sincerely,

Bernard K. Bradshaw
Vice President

BKB/dc

RECEIVED

OCT 11 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

O. WMD
cc RF

RECEIVED
OCT 15 1985
SOLID WASTE BRANCH
U.S. EPA, REGION V

<u>Name</u>	<u>EPA Id. No.</u>
Hardy Division 1225 West Pearl Street P. O. Box 109 Union City, Indiana 47390	IND 006066377
Muncie Plant 1700 Macedonia Muncie, Indiana 47302	IND 079589628
Portland Division 210-510 South Bridge Street Portland, Indiana 47371	IND 006066559
Montpelier Plant 623 West Monroe Street Montpelier, Indiana 47359	IND 006066435
Grabill Plant P. O. Box 500 Grabill, Indiana 46741	IND 005380381

CHAPTER 1

WASTE ANALYSIS PLAN

SHELLER-GLOBE CORPORATION
MONTPELIER PLANT
HAZARDOUS WASTE PROFILE SHEET

WASTE NAME Polyol Blend

PROCESS GENERATING WASTE RIM Polyurethane

INFORMATION SOURCE MSDS & Process Knowledge

WASTE PHYSICAL STATE Solid Sludge X Liquid

VISCOSITY Low Medium High

DENSITY 1.04 Flash Pt. >200° F

PH n/a % Solids 97%

CHEMICAL COMPOSITION

CHEMICAL

CONCENTRATION

1. Polypropylene Oxide 85-90%

2. Ethylene Glycol 7-10%

3. Trichlorofluoromethane 2- 4%

4.

5.

IS WASTE REACTIVE no TO WHAT CHEMICALS

U.S. EPA HAZARDOUS WASTE NUMBER(S) F002

U.S. DOT SHIPPING NAME Hazardous Waste, Liquid, n.o.s.

U.S. DOT HAZARD CLASS ORM-E UN NUMBER UN 9189

TYPE OF STORAGE CONTAINER 55-gallon drum

SPECIAL HANDLING INSTRUCTIONS

ADDITIONAL COMMENTS

SHELLER-GLOBE CORPORATION
MONTPELIER PLANT
HAZARDOUS WASTE PROFILE SHEET

WASTE NAME Paint & Lab Wastes

PROCESS GENERATING WASTE Rubber Painting & Laboratory

INFORMATION SOURCE MSDS & Process Knowledge

WASTE PHYSICAL STATE Solid Sludge X Liquid

VISCOSITY X Low Medium High

DENSITY 0.88 Flash Pt. <100° F

PH n/a % Solids 5-10%

CHEMICAL COMPOSITION

CHEMICAL

CONCENTRATION

- | | | |
|----|--|--------|
| 1. | Typical organic paint solvents | 80-90% |
| | (Toluene, Xylene, Methyl Ethyl Ketone, | |
| 2. | Acetone, Isopropyl Acetate, Butyl Ace- | |
| | tate, Methyl Isobutyl Ketone, Etc.) | |
| 3. | | |
| 4. | | |
| 5. | | |

IS WASTE REACTIVE no TO WHAT CHEMICALS

U.S. EPA HAZARDOUS WASTE NUMBER(S) F005 F003

U.S. DOT SHIPPING NAME Waste Flammable Liquid, n.o.s.

U.S. DOT HAZARD CLASS Flammable Liquid UN NUMBER UN 1993

TYPE OF STORAGE CONTAINER 55-gallon drum

SPECIAL HANDLING INSTRUCTIONS Caution: Flammable. Store waste only in flammable

ADDITIONAL COMMENTS liquid storage building. Dot Red Label required.

SHELLER-GLOBE CORPORATION

MONTPELIER PLANT

HAZARDOUS WASTE PROFILE SHEET

WASTE NAME Chlorinated SolventPROCESS GENERATING WASTE RIM Polyurethane MaintenanceINFORMATION SOURCE MSDS & Process KnowledgeWASTE PHYSICAL STATE Solid Sludge X LiquidVISCOSITY X Low Medium HighDENSITY 1.32 Flash Pt. n/a PH n/a % Solids 0-10%

CHEMICAL COMPOSITION

CHEMICALCONCENTRATION

1. 1,1,1 - Trichloroethane 80-90%

2. Mineral Spirits 5-15%

3.

4.

5.

IS WASTE REACTIVE no TO WHAT CHEMICALS U.S. EPA HAZARDOUS WASTE NUMBER(S) F001U.S. DOT SHIPPING NAME Hazardous Waste Liquid, n.o.s.U.S. DOT HAZARD CLASS ORM-E UN NUMBER UN 9189TYPE OF STORAGE CONTAINER 55-gallon drumSPECIAL HANDLING INSTRUCTIONS ADDITIONAL COMMENTS

SHELLER-GLOBE CORPORATION
MONTPELIER PLANT
HAZARDOUS WASTE PROFILE SHEET

WASTE NAME Rubber Solvent

PROCESS GENERATING WASTE Dept. 18 Splice Operation

INFORMATION SOURCE MSDS & Process Knowledge

WASTE PHYSICAL STATE Solid Sludge X Liquid

VISCOSITY X Low Medium High

DENSITY 0.70 Flash Pt. 20° F

PH n/a % Solids 0-5%

CHEMICAL COMPOSITION

CHEMICAL

CONCENTRATION

1. Petroleum Naptha 95-100%

2.

3.

4.

5.

IS WASTE REACTIVE no TO WHAT CHEMICALS

U.S. EPA HAZARDOUS WASTE NUMBER(S) D001

U.S. DOT SHIPPING NAME Waste Flammable Liquid, n.o.s.

U.S. DOT HAZARD CLASS Flammable Liquid UN NUMBER UN 1993

TYPE OF STORAGE CONTAINER 55-gallon drum

SPECIAL HANDLING INSTRUCTIONS Caution: Flammable. Store waste only in flammable

ADDITIONAL COMMENTS liquid storage building. Dot Red Label required.

SHELLER-GLOBE CORPORATION
MONTPELIER PLANT
HAZARDOUS WASTE PROFILE SHEET

WASTE NAME Waste Gunk

PROCESS GENERATING WASTE Pipeseal Tube Cleaning

INFORMATION SOURCE MSDS and Process Knowledge

WASTE PHYSICAL STATE Solid Sludge X Liquid

VISCOSITY X Low Medium High

DENSITY 9.5-10.5 #/lb. Flash Pt. N/A

PH 11.8 - 12.8 % Solids 30 - 40

CHEMICAL COMPOSITION

<u>CHEMICAL</u>	<u>CONCENTRATION</u>
1. Potassium Hydroxide	1 - 1.5%
2. Sodium Dichromate	0.2%
3. Phenol	3.4 - 4.3%
4. O-M-P Cresol	13.3 - 16.3%
5. Perchloroethylene	8.1 - 10.1%
6. Methylene Chloride	34.1 - 43.3%
IS WASTE REACTIVE <u> No </u>	TO WHAT CHEMICALS <u> </u>

U.S. EPA HAZARDOUS WASTE NUMBER(S) D002 F002 D007

U.S. DOT SHIPPING NAME Waste Corrosive Liquid, n.o.s.

U.S. DOT HAZARD CLASS Corrosive UN NUMBER UN1760

TYPE OF STORAGE CONTAINER 17E OR17H 55-Gallon Drum

SPECIAL HANDLING INSTRUCTIONS Caution - Corrosive

ADDITIONAL COMMENTS Need eye protection - goggles and solvent resistant glove.

SHELLER-GLOBE CORPORATION
MONTPELIER PLANT
WASTE ANALYSIS PLAN

The Montpelier Plant of the Sheller-Globe Corporation stores on-site only those hazardous wastes generated by on-site operations. No hazardous wastes are received from an off-site facility.

All plant processes that generate waste material have been reviewed to determine if the waste material is hazardous. The U.S. EPA listings of hazardous wastes are then consulted to determine if the waste material is a listed hazardous waste or contains any materials that are listed. The determination shall be based on:

- 1) Published or supplied MSDS information of the starting materials, and/or
- 2) Knowledge of the operation (i.e., chemical reactions changing the characteristic of the starting material).
- 3) When there is doubt as to the accuracy of determining a waste to be hazardous using the above methods, then a representative sample of the waste will be tested regarding its ignitability, toxicity, corrosivity, and reactivity characteristics.
- 4) Processes which use the following solvents will be reviewed to determine if the solvent mixtures/blend used in the operation contains, before use, a total of 10% or more of one or more of these solvents.

<u>Solvent Constituent</u>	<u>Treatment Standard</u> <u>(mg/liter)</u>
Acetone	0.59
n-Butyl alcohol	5.0
Carbon disulfide	4.81
Carbon tetrachloride	0.96
Chlorobenzene	0.05
Cresols and cresylic acid	0.75
Cyclohexanone	0.75
1,2-Dichlorobenzene	0.125
Ethyl acetate	0.75
Ethyl ether	0.75
Ethyl benzene	0.053
Isobutanol	5.0
Methanol	0.75
Methylene chloride	0.96
Methylene chloride (from pharmaceutical industry)	0.96
Methyl ethyl ketone	0.75
Methyl isobutyl ketone	0.33
Nitrobenzene	0.125
Pyridine	0.33
Tetrachloroethylene	0.05
Toluene	0.33
1,1,1-Trichloroethane	0.41
1,2,2-Trichloro-1,2,2-trifluoroethane	0.96
Trichloroethylene	0.091
Trichlorofluoromethane	0.96
Xylene	0.15

Any waste or spent solvents generated from processes which use solvent mixtures/blend containing, before use, a total of 10% or more of the above solvents are subject to the land disposal restrictions rule and must meet the above treatment standards before disposal in a landfill.

If the waste or spent solvents cannot meet the above treatment standards, then Sheller-Globe must notify with each shipment the treatment or storage facility in writing of the appropriate treatment standards (see attached sample form).

This notification form is to be attached to the manifest of each shipment of this waste. Also, a copy of the notification is to be retained on site by Sheller-Globe for a minimum of five years from date of shipment.

Presently, the plant's hazardous wastes are grouped together in the following classifications for handling, transporting, storage, and disposal. Each classification contains Material Safety Data Sheets for all raw materials included in the classification. Sampling methods and parameters to be tested for in determining if the waste materials are hazardous will also be included in each classification. Analysis of each classification of waste material will be performed as required, following the test methods listed for the classification. Changes in operations generating hazardous waste materials will require a new analysis be performed.

HAZARDOUS WASTE GENERATED AT MONTPELIER PLANT

<u>Waste</u>	<u>Source</u>
Flammable Liquid	Methyl Ethyl Ketone, Lab Wastes, Toluene, Xylene, waste paint, etc.
Isocyanates	MDI, etc.
Waste Gunk	Pipe Cleaning Operation (Caustic)
Waste Polyol	Activator, Polyol, etc.
1,1,1 Trichloroethane	Cleaning Solvent

HAZARDOUS WASTE TESTING

PARAMETERS AND RATIONALE FOR THEIR SELECTION

WASTE	PARAMETER	RATIONALE
Waste Flammable Liquid	Flash Point	Waste will ignite. Raw material has low flash point.
Waste Polyol	Flash Point	Waste may contain ignitable material.
Waste Isocyanate	% Trichlorofloromethane	Material is reactive with water. We have classified this waste material as hazardous because of its reactivity.
Waste	% 1,1,1 Trichloroethane	Waste may contain ignitable material.
Gunk	Flash Point	
	Corrosive	Stripping chemicals are corrosive. Sludge from stripping process will also be corrosive.
	% Methylene Chloride	

HAZARDOUS WASTE

PARAMETER AND TEST METHOD

PARAMETER	TEST METHOD	REFERENCE
Flash Point	Pensky-Martin Close-cup tested	Test methods for evaluating solid waste, physical/chemical methods U.S. EPA SW-846.
%Trichlorofloromethane	Method for Volatile Organics	"
% 1,1,1 Trichloroethane	"	"
Corrosivity	pH Measurement	"

HAZARDOUS WASTE AT THE MONTPELIER PLANT

WASTE	HAZARD	BASIS FOR HAZARDOUS DESIGNATION
<u>DRUM</u>		
Waste Flammable Liquid	Ignitable	Flash point less than 100°F
Waste Polyol	Ignitable, Toxic	Flash point less than 140°F
Waste Isocyanate	Reactive	Material will react with water and is a listed hazardous waste
Waste 1,1,1 Trichloroethane	Toxic	Listed hazardous waste
Waste Gunk	Corrosive, Toxic	Stripping chemicals are very corrosive with Methylene Chloride

HAZARDOUS WASTE

METHODS FOR SAMPLING

WASTE	SAMPLING METHOD	DESCRIPTION OF SAMPLE	REFERENCE
Waste Isocyanate	Sampling drums from "Samplers and Sampling" Procedures for Hazardous Waste Streams, EPA-600/2-80-018	Composite sample using a Coliwasa sampler from 3 grab samples (top, middle and bottom)	Test methods for the evaluation of solid waste, physical/chemical method, EPA-500-85-846
Waste Flammable Liquid	"	"	"
Polyol	"	"	"
Waste 1,1,1 Trichloroethane	"	"	"
Waste Gunk	"	Composite sample using a trier sampler taking two (2) core samples from top to bottom of drum	"

C.2 Compliance

Remailed (different President)

1/23/90

Swanson



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street

P.O. Box 6015

Indianapolis 46206-6015

Telephone 317/232-8603

NOTICE OF VIOLATION

Cause No. H-128

RECEIVED
JAN 25 1990

OFFICE OF
Waste Management
U.S. EPA

TO: Mr. Fred Hay
President
United Technologies Automotive, Inc.
(Engineered Systems Division)
1641 Porter Street
Detroit, Michigan 48216

C T Corporation System,
Resident Agent for
Sheller Globe Corporation
One North Capitol Avenue
Indianapolis, Indiana 46204

VIA CERTIFIED MAIL NO. P 446 479 350 VIA CERTIFIED MAIL NO. P 446 479 351

A designated representative of the Indiana Department of Environmental Management (Department) conducted an inspection and record review of your facility, located at 623 West Monroe Street, Montpelier, Indiana, on March 13, 1989, and on July 8, 1988, respectively. The United States Environmental Protection Agency (U.S. EPA) I.D. number of your facility is **IND 006066435**.

The inspection and record review, conducted by Mr. Stephen C. Hunter and Mr. Jeff W. Stevens of the Office of Solid and Hazardous Waste Management (OSHWM) of the Department, revealed violations of the Hazardous Waste Management Rules under 329 IAC 3.

The violations observed are as stated in Finding Numbers 6 and 7 of the enclosed proposed Agreed Order.

In accordance with IC 13-7-11-2(b), this Notice of Violation is issued to offer you an opportunity to enter into an Agreed Order providing for the actions required to correct the violations and for the payment of a civil penalty. I am not required to extend this offer for more than sixty (60) days from your receipt of this Notice of Violation.

Entering into and timely compliance with the enclosed Agreed Order will constitute the final resolution of these violations. If you are also willing to resolve this matter as provided for in the Agreed Order, sign and return it as soon as possible. In any event, a response must be made within sixty (60) days of your receipt of this Notice. If you do not agree to the specific terms of the proposed Agreed Order, but are willing to enter into a modified Agreed Order, please contact Ms. Debra K. Faulkner of the OSHWM at AC 317/232-7202 within fifteen (15) days of receipt of this Notice to relate your comments or arrange for a conference to discuss this matter further.

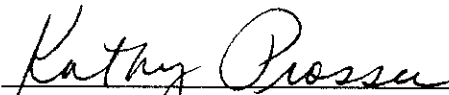
An Equal Opportunity Employer

If settlement is not reached within sixty (60) days of your receipt of this Notice, an Order will be issued pursuant to IC 13-7-11-2(c) containing the actions you must take to achieve compliance, the required time frames, and an appropriate civil penalty.

The advantages of entering into an Agreed Order now, prior to proceedings under IC 13-7-11-2(c), are:

1. At this stage of the proceedings, it is not required that you admit the violations in the Agreed Order as stated.
2. Normally, the assessed civil penalty will be larger if imposed by an ORDER of the Commissioner under IC 13-7-11-2(c).
3. The timely entry into an Agreed Order will prevent the necessity of a formal Order being issued and publicized as required by IC 13-7-11-2(c), or the filing of a civil court action under IC 13-7-5-7.

Dated this 22nd day of December, 1989.


Kathy Prosser
Commissioner

Enclosure

cc: Ms. Sally K. Swanson, U.S. EPA, Region V (with proposed Agreed Order) ✓
Blackford County Health Department (with proposed Agreed Order)
Office of Legal Counsel (with proposed Agreed Order)
Mr. Dennis M. Zawodni (with proposed Agreed Order)
Mr. Stephen C. Hunter (with proposed Agreed Order)
Mr. Jeff W. Stevens (with proposed Agreed Order)

Sally Swanson



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IND-006-066-435

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

VIA CERTIFIED MAIL P 124 435 184

July 5, 1990

Mr. Fred Hay, President
United Technologies Automotive, Inc.
(Engineered Systems Division)
1641 Porter Street
Detroit, Michigan 48216

Re: Adoption of Agreed Order in
Cause No. H-128
Indiana Department of
Environmental Management
versus
Sheller-Globe Corporation

Dear Mr. Hay:

This is to inform you that the Commissioner of the Indiana Department of Environmental Management (Department) approved the Agreed Order negotiated between you or your representatives and members of our staff. A copy of the Final Order, executed by the Commissioner on behalf of the Department is enclosed.

You are, no doubt, familiar with the terms of the Final Order necessary to ensure future compliance. The time frames for compliance are effective upon your receipt of this correspondence. As to the civil penalty provided for in the document, please forward a check, made payable to the Environmental Management Special Fund, to this office within thirty (30) days of the receipt of this correspondence.

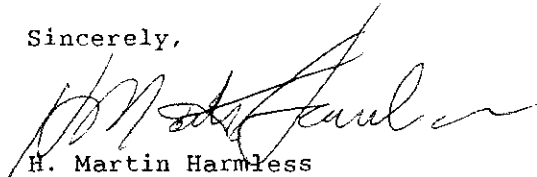
An Equal Opportunity Employer

Mr. Fred Hay, President

Page 2

Please direct any questions you may have, or any submittals required under the Order, to Ms. Debra K. Faulkner of our Hazardous Waste Enforcement Section at this address or contact her by telephone at AC 317/232-3411.

Sincerely,



H. Martin Harmless
Assistant Commissioner for
Solid and Hazardous Waste Management

DKF/sc

Enclosure

cc: Blackford County Health Department (with enclosure)
Mr. Edward Mahon, Respondent Attorney (with enclosure)
Ms. Sally K. Swanson, U.S. EPA, Region V (with enclosure)
Office of Legal Counsel
Mr. Dennis M. Zawodni (with original enclosure)
Mr. Robert F. Burke
Mr. Jeff W. Stevens



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

IN THE MATTER OF THE:)
)
COMMISSIONER,)
INDIANA DEPARTMENT OF)
ENVIRONMENTAL MANAGEMENT)
)
 Complainant)
)
 vs.)
)
SHELLER GLOBE CORP.)
)
 Respondent)

BEFORE THE INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

CAUSE NO. H-128

AGREED ORDER

Come now the parties to this cause and, being desirous of settling and compromising this action without hearing or adjudication of any issue of fact or law, hereby consent to the following FINDINGS and ORDER. This document shall not constitute any evidence or admission by any party hereto, but shall be solely for the purposes of settling this action.

FINDINGS

NOW, THEREFORE, upon the consent of the parties hereto, and for the purposes of this cause only, the following FINDINGS are made:

1. The Complainant is the Commissioner of the Indiana Department of Environmental Management (hereinafter referred to as "the Commissioner").
2. The Indiana Department of Environmental Management (hereinafter referred to as the "Department") has jurisdiction over both the parties and the subject matter of this action.
3. Respondent, Sheller Globe Corp. (hereinafter referred to as "Sheller Globe"), is a company authorized to do business in Indiana and operates a place of business at 623 West Monroe Street, Montpelier, Indiana.

4. Sheller Globe notified the United States Environmental Protection Agency (U.S. EPA) as a generator and treatment, storage, and disposal facility on August 13, 1980. The company notified a second time on May 24, 1985, as a generator of hazardous waste. The company's U.S. EPA Identification Number is IND 006066435.
5. On June 26, 1989, Sheller Globe submitted certification of closure for its hazardous waste container storage areas to the Department.
6. Based upon a record review of the facility on July 8, 1988, by Mr. Jeff W. Stevens of the Office of Solid and Hazardous Waste Management (hereinafter referred to as the "OSHWM") of the Department, the Department contends that the following violation was in existence or observed at the time of the record review.
 - a. Pursuant to 329 IAC 3-22-24(a), the owner or operator of a hazardous waste treatment, storage, or disposal facility must demonstrate financial responsibility for claims arising from the operations of said facility from sudden and accidental occurrences that cause injury to persons or property. Based on information gathered by the Department, Respondent has not yet established proof of financial responsibility for claims arising from the operations of said facility from sudden and accidental occurrences that cause injury to persons or property. The facility has lacked liability coverage since August 17, 1987.
7. Based upon an investigation of the facility on March 13, 1989, by Mr. Stephen C. Hunter of the Office of Solid and Hazardous Waste Management (hereinafter referred to as the "OSHWM") of the Department, the Department contends that the following violations were in existence or observed at the time of the inspection.
 - a. Pursuant to 329 IAC 3-16-4, an owner or operator must specify in the written waste analysis plan the procedures he will carry out to comply with the requirements of 329 IAC 3-16-4(a). Based on information gathered by the Department, Respondent's waste analysis plan did not adequately describe the frequency of analysis, the sampling method which will be used to obtain a representative sample, and the test methods that will be used to test for waste parameters.
 - b. Pursuant to 329 IAC 3-16-6, the owner or operator inspections shall include the inspection of safety and emergency equipment. Based on information gathered by the Department, Respondent's inspections did not include the inspection of safety and emergency equipment. The facility's inspection schedule did not include all appropriate safety and emergency equipment such as the hazardous material spill kit, turnout gear, disposable clothing and first-aid kit.
 - c. Pursuant to 329 IAC 3-16-6, the owner or operator shall develop and follow a written schedule for inspections. Based on information gathered by the Department, Respondent has not followed the written schedule for inspections.

- d. Pursuant to 329 IAC 3-16-6, the inspection log shall contain the name of the inspector. Based on information gathered by the Department, Respondent has not documented the name of the inspector in the inspection log.
- e. Pursuant to 329 IAC 3-16-6, the inspection log shall contain the date and nature of any repairs or remedial actions. Based on information gathered by the Department, Respondent has not documented the date and nature of any repairs or remedial actions in the inspection log.
- f. Pursuant to 329 IAC 3-16-7, the owner or operator shall maintain job titles and the names of the employees filling the positions. Based on information gathered by the Department, Respondent has not maintained a job title and the name of the employee filling the position. Personnel training records did not include the job title of the Human Resources Manager and the records lacked a listing of all employees for each job.
- g. Pursuant to 329 IAC 3-16-7, the owner or operator shall maintain a written job description for each position. Based on information gathered by the Department, Respondent has not maintained a written job description for each position that relates to hazardous waste management.
- h. Pursuant to 329 IAC 3-16-7, the owner or operator shall maintain a written description of the type and amount of both introductory and continuing training given to each employee. Based on information gathered by the Department, Respondent has not maintained a written description of the type and amount of both introductory and continuing training. The description of the introductory and continuing training did not clearly describe the annual review of training.
- i. Pursuant to 329 IAC 3-16-7, the owner or operator shall maintain records that document the training or job description. Based on information gathered by the Department, Respondent has not maintained records that document the training or job description. Personnel training records did not include records of the Emergency Response Team's training in the Emergency Response Team's duties and did not include records of on-the-job training.
- j. Pursuant to 329 IAC 3-16-7, facility personnel must receive initial RCRA training within six (6) months after the date of their employment. Based on information gathered by the Department, Respondent has not provided personnel with initial RCRA training. No RCRA training has been conducted for new employees since February 21, 1987. Mr. Jerry Dulworth (emergency response team) has not received any training and was hired prior to February 1987.
- k. Pursuant to 329 IAC 3-16-7, facility personnel shall participate in an annual review of initial training. Based on information gathered by the Department, Respondent has not given an annual

review of initial training to facility personnel. Employees hired prior to February 1987 were last trained on February 21, 1987.

1. Pursuant to 329 IAC 3-18-3, the contingency plan shall include a list of all emergency equipment at the facility, location of equipment, physical description of each item on the list, and a brief outline of its capabilities. Based on information gathered by the Department, Respondent has not included an adequate description of the location of the fire extinguishers, and a physical description for the emergency equipment in the contingency plan.
- m. Pursuant to 329 IAC 3-18-3, the contingency plan shall list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators. The contingency plan did not include the current home addresses and phone numbers of emergency coordinators. Mr. William Hoyt, currently the emergency coordinator, is not listed in the plan and Mr. Dean Monroe, currently an alternate emergency coordinator, is listed as the emergency coordinator.
- n. Pursuant to 329 IAC 3-19-4, the operating record shall contain a description and the quantity of each hazardous waste received and the methods and dates of each waste's treatment, storage, or disposal. Based on information gathered by the Department, the facility's operating record did not contain the following information: waste stream's common name, U.S. EPA hazardous waste identification number, the waste's physical form, the method (S01) of the waste's storage, and the weight or volume and density of the waste.
- o. Pursuant to 329 IAC 3-19-4, the location and quantity of each hazardous waste within the facility shall be maintained in the operating record. Based on information gathered by the Department, Respondent has not maintained the location and quantity of each hazardous waste within the facility in the operating record. The operating record indicated nineteen (19) containers were located at the container storage pad when twenty (20) containers were present.
- p. Pursuant to 329 IAC 3-8-1 and 329 IAC 3-14-3, the total quantity of wastes and the type and number of containers loaded shall be found on manifests. Based on information gathered by the Department, Respondent has not provided the proper abbreviation for the type of container loaded (used M instead of DM) on Manifest IN 051428.
- q. Pursuant to 329 IAC 3-8-1, manifests shall contain a proper DOT description for waste shipped. Based on information gathered, Respondent did not include the proper DOT description on the manifest for the wastes shipped.

- r. Pursuant to 329 IAC 3-14-3, a generator must identify the waste streams on the manifest. Based on information gathered by the Department, Respondent incorrectly identified waste methyl ethyl ketone (MEK) (F005) as D001 on the manifest.
- s. Pursuant to 329 IAC 3-7-2, a generator is required to determine if his waste is hazardous. Based on information gathered by the Department, Respondent has not determined if the waste in storage and disposed of is hazardous. The Respondent had not made a waste determination on waste cement/naptha used at the extrusion lines and disposed of in dumpsters. Also, two (2) waste streams were incorrectly identified: (a) waste MEK (F005) was incorrectly determined to be a D001 waste, and (b) Lab waste and solvent were incorrectly determined to be D001 instead of the proper F listing (F005 or possibly F003).
- t. Pursuant to 329 IAC 3-10-1, all test results and analyses shall be retained for at least three (3) years. Based on information gathered by the Department, Respondent has not retained all test results and analyses for at least three (3) years. Also, the Respondent has a waste stream described on the manifests as "Waste Combustible Liquid NOS Combustible NA 1993, D001." The facility did not have test results and analysis on file for this waste stream.
- u. Pursuant to 329 IAC 3-9-5, hazardous waste containers shall be clearly marked with start of accumulation date for that container. Based on information gathered by the Department, Respondent has not marked the hazardous waste containers with the date of the start of accumulation. One (1) container of waste trichloroethylene (TCE) maintenance area, two (2) containers of waste naptha in department 18, and one (1) container of freon and polyblend in the batching area were not marked with the start of accumulation date. Respondent contends this violation has since been corrected.
- v. Pursuant to 329 IAC 3-9-5, hazardous waste containers shall be marked with the words "Hazardous Waste." One (1) container of waste TCE in the maintenance area was not marked with the words "Hazardous Waste," and one (1) satellite accumulation five (5)-gallon container in the paint room was not marked with the words "Hazardous Waste" or with other words that identify the contents of the container. Respondent contends this violation has since been corrected.
- w. Pursuant to 329 IAC 3-23-4, the containers of hazardous waste shall be stored closed. Based on information gathered by the Department, containers of hazardous waste were not stored closed. One (1) 5-gallon satellite accumulation container in the lab, one (1) 5-gallon satellite accumulation container in the paint room, one (1) container in the maintenance area, one (1) container in the paint room, and one (1) container in the batching area were not stored closed. Respondent contends this violation has since been corrected.

- x. Pursuant to 329 IAC 3-23-2, containers shall be stored in good condition. Based on information gathered by the Department, Respondent has not stored containers in good condition. One (1) container of hazardous waste was dented and a second container had a bulging lid while stored on the interim status container storage pad. Respondent contends this violation has since been corrected.
- y. Pursuant to 329 IAC 3-16-8, the owner or operator shall post "No Smoking" signs on premises where required. Based on information gathered by the Department, Respondent has not posted "No Smoking" signs on the premises wherever there is a hazard from ignitable or reactive waste. This violation has since been corrected.
- z. Pursuant to 329 IAC 3-17-3, the owner or operator shall install portable fire extinguishers, fire control, spill control equipment, and decontamination equipment as required. Based on information gathered by the Department, Respondent has not provided dedicated spark proof shovels.
- aa. Pursuant to 329 IAC 3-23-4, containers must be stored so that they can be inspected for leaks and for deterioration caused by corrosion or other factors, without having to move the containers during the inspection and so that adequate aisle space exists between rows (about two and one-half (2 1/2) feet). Based on information gathered by the Department, Respondent had not provided adequate aisle space at the container storage pad. Containers were stored four (4) wide with no aisle space. This violation has since been corrected.
- bb. Pursuant to 329 IAC 3-16-5, danger signs shall be posted at each entrance to the active portions of the facility. Based on information gathered by the Department, Respondent has not posted danger signs at each entrance to the active portions of the facility.
- cc. Pursuant to 329 IAC 3-16-5, security measures shall include 24-hour surveillance or an artificial or natural barrier around the facility with a means to control entry. Based on information gathered by the Department, Respondent has not provided security measures which include 24-hour surveillance or an artificial or natural barrier around the entry. The gates of the perimeter fence were not locked at the time of the inspection.
- dd. Pursuant to 329 IAC 3-17-5, the owner or operator shall provide immediate access to internal alarms. Based on information gathered by the Department, Respondent has not provided immediate access to internal alarms or a communication device for personnel working at the container storage area.
- ee. Pursuant to 329 IAC 3-17-2 and IC 13-7-4, the owner or operator shall manage hazardous wastes to prevent any fire, explosion, or release of hazardous waste or hazardous waste constituents on

the premises which could threaten human health or the environment. Based on information gathered by the Department, there is evidence of fire, explosion, or release of hazardous waste or hazardous waste constituents on the premises which could threaten human health or the environment. Numerous minor spills were noted of what appeared to be used oil around the receiving dock on the south side of the plant. A larger spill of a black, oily substance located south of the receiving dock area near the south perimeter fence was noted. Containers of unused recycle solvent (marked "Reclaimed MEK") were stored on and near this spill. At the interim status container storage pad, extensive spillage covered with oil dry was observed on the pad as well as running off the pad.

8. Pursuant to Indiana Code 13-7-11-2(b) and 4-21.5, a Notice of Violation was issued to the Respondent, a copy of which is enclosed and incorporated herein by reference.
9. In recognition of the settlement reached, Respondent waives any right to administrative review of this Agreed Order.

ORDER

WHEREFORE, based upon the above FINDINGS and upon the consent of the parties, it is hereby ORDERED that:

1. Upon the effective date of the Order, Respondent shall not store hazardous waste on-site for greater than ninety (90) days.
2. Within thirty (30) days of the effective date of the Order, Respondent shall develop and maintain personnel training records as required in 329 IAC 3-16-7 and submit a copy to the Department for approval.
3. Within thirty (30) days of the effective date of the Order, Respondent shall ensure personnel complete initial RCRA training and submit documentation of completion of the training to the Department for approval.
4. Within thirty (30) days of the effective date of the Order, Respondent shall ensure that facility personnel participate in an annual review of initial training.
5. Within thirty (30) days of the effective date of the Order, Respondent shall revise the contingency plan to include an adequate description of the location of the fire extinguishers, and a physical description for the emergency equipment on the list.
6. Within thirty (30) days of the effective date of the Order, Respondent shall revise the contingency plan to list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators.

7. Within thirty-five (35) days of the effective date of the Order, Respondent shall submit a copy of the revised contingency plan to the Department for approval.
8. Within ten (10) days of the effective date of the Order, Respondent shall submit to the Department and the designated facility a copy of corrected manifest IN 051428 which includes the proper abbreviation for the type of container used, the proper DOT shipping names and hazardous waste codes for the wastes, and ensure that proper abbreviations, DOT shipping names, and hazardous waste codes are used on all future manifests.
9. Within thirty (30) days of the effective date of the Order, Respondent shall make a proper waste determination for the waste MEK and for the lab waste and solvent.
10. Within fifteen (15) days of the effective date of the Order, Respondent shall submit information documenting what the waste stream described on the manifests as "Waste Combustible Liquid NOS Combustible NA 1993, D001" is and its correct designation.
11. Upon the effective date of the Order, Respondent shall ensure that all hazardous waste containers in the satellite accumulation areas are marked with the words "Hazardous Waste" or with other words identifying the waste and ensure that all hazardous waste containers in the storage areas are marked with the words "Hazardous Waste."
12. Upon the effective date of the Order, ensure that all hazardous waste containers other than satellite accumulation areas are clearly marked with the start of accumulation date.
13. Upon the effective date of the Order, Respondent shall ensure that all hazardous waste containers are stored closed.
14. Upon the effective date of the Order, Respondent shall ensure that containers are stored in good condition.
15. Within thirty (30) days of the effective date of the Order, Respondent shall provide dedicated, spark-proof shovels.
16. Upon the effective date of the Order, Respondent shall maintain adequate aisle space as required by 329 IAC 3-23-4.
17. Within thirty (30) days of the effective date of the Order, Respondent shall provide immediate access to internal alarms or a communication device at the container storage area.
18. Within thirty (30) days of the effective date of the Order, Respondent shall remove all visible contamination and visibly contaminated soil and submit documentation of disposal.
19. Within thirty (30) days of the effective date of the Order, Respondent shall revise its waste analysis plan to include the frequency of analysis, the sampling method which will be used to

obtain a representative sample, and the test methods that will be used to test for waste parameters.

20. Within thirty-five (35) days of the effective date of the Order, Respondent shall submit a copy of the revised waste analysis plan to the Department for approval.
21. Within thirty (30) days of the effective date of the Order, Respondent shall revise the inspection schedule to include the inspection of all safety and emergency equipment.
22. Within thirty (30) days of the effective date of the Order, Respondent shall maintain the inspector's name in the inspection log.
23. Within thirty (30) days of the effective date of the Order, Respondent shall maintain the date and nature of any repairs or remedial actions in the inspection log.
24. Within thirty (30) days of the effective date of the Order, Respondent shall follow the revised written inspection schedule for inspections and submit a copy to the Department for approval.
25. Within thirty (30) days of the effective date of the Order, Respondent shall revise the operating record to include the waste stream's common name, the U.S. EPA hazardous waste identification number, the waste's physical form, the method (S01) of the waste's storage, and the weight or volume and density of the waste. Submit a copy of the revised record to the Department for approval.
26. Within thirty (30) days of the effective date of the Order, Respondent shall revise the operating record to include the location and quantity of each hazardous waste within the facility and submit a copy of the revised record to the Department for approval.
27. Upon the effective date of the Order, Respondent shall ensure that all test results and analyses are retained for three (3) years.
28. Upon the effective date of the Order, Respondent shall maintain security measures which include 24-hour surveillance or an artificial or natural barrier around the facility with a means to control entry.
29. Upon the effective date of the Order, Respondent shall post danger signs at each entrance to the active portions of the facility.
30. Upon receipt of the Letter of Closure Certification from the Department, Respondent shall not be required to comply with Orders 19 through 29.
31. Within thirty (30) days of the effective date of the Order, Respondent shall pay a civil penalty of \$13,200 to the Indiana Environmental Management Special Fund. This shall be addressed to the Office of Solid and Hazardous Waste Management, Attention: Cashier.

32. In addition to the civil penalty set out above, the Respondent shall pay an additional civil penalty of \$500 per day for each day of noncompliance with the time limits set out in this ORDER.
33. In the event Respondent fails to comply with any requirement of this Order, and if such failure (a) is caused by persons or events beyond Respondent's control which cannot be overcome by due diligence, and (b) delays any performance, or makes impossible substantial performance, of any obligation required under this Order, then such failure shall not be considered a violation of this Order, but attributable rather to a force majeure event. Respondent shall have the burden of establishing the existence of a force majeure event. Force Majeure shall not include increased costs or expenses incurred in performing the obligations required under this Order.
34. The provisions of this AGREED ORDER will apply to the Respondent, its agents, servants, employees, successors, and assigns, and to all persons, firms, or corporations acting through or for the Respondent.
35. This AGREED ORDER will have no force or effect until it is approved by the Commissioner, and timely compliance with the terms of this AGREED ORDER shall constitute a final resolution of this cause.
36. Respondent, by the duly authorized undersigned, hereby consents to the provisions of this FINDINGS and ORDER and agrees to be bound by said ORDER when issued by the Commissioner.

TECHNICAL RECOMMENDATION

BY: Dennis M. Zawodni
Dennis M. Zawodni, Chief
Enforcement Section

DATE: March 8, 1990

COUNSEL FOR COMPLAINANT

BY: Stanley H. Rende
5/14/90
Office of Legal Counsel
Department of Environmental
Management

Sheller Globe Corp,

BY: L. J. Shaver

DATE: 3/23/90

ATTORNEY FOR RESPONDENT

BY: Wesley H. Hersh
DATE: March 29, 1990

APPROVED FOR LEGALITY AND FORM

LINLEY E. PEARSON
Attorney General of Indiana

BY: [Signature]
Deputy Attorney General

DATE: Rec 5/17/90 App 5/18/90

APPROVED AND ADOPTED BY THE INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

this 13th day of June, 1990.


Kathy Prosser
Commissioner

Enclosure

mailed
1/8/90

Swanson



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IND 006-066-435

RECEIVED
JAN 11 1990

OFFICE OF RCRA NOTICE OF VIOLATION
Waste Management Division
U.S. EPA, REGION 17

Cause No. H-128

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

TO: Mr. Alford A. Grava,
President
Sheller Globe Corporation
3323 Bloomfield Park
West Bloomfield, Michigan 48033

C T Corporation System,
Resident Agent for
Sheller Globe Corporation
One North Capitol Avenue
Indianapolis, Indiana 46204

VIA CERTIFIED MAIL NO. P 446 479 322 VIA CERTIFIED MAIL NO. P 446 479 323

A designated representative of the Indiana Department of Environmental Management (Department) conducted an inspection and record review of your facility, located at 623 West Monroe Street, Montpelier, Indiana, on March 13, 1989, and on July 8, 1988, respectively. The United States Environmental Protection Agency (U.S. EPA) I.D. number of your facility is IND 006066435.

The inspection and record review, conducted by Mr. Stephen C. Hunter and Mr. Jeff W. Stevens of the Office of Solid and Hazardous Waste Management (OSHWM) of the Department, revealed violations of the Hazardous Waste Management Rules under 329 IAC 3.

The violations observed are as stated in Finding Numbers 6 and 7 of the enclosed proposed Agreed Order.

In accordance with IC 13-7-11-2(b), this Notice of Violation is issued to offer you an opportunity to enter into an Agreed Order providing for the actions required to correct the violations and for the payment of a civil penalty. I am not required to extend this offer for more than sixty (60) days from your receipt of this Notice of Violation.

Entering into and timely compliance with the enclosed Agreed Order will constitute the final resolution of these violations. If you are also willing to resolve this matter as provided for in the Agreed Order, sign and return it as soon as possible. In any event, a response must be made within sixty (60) days of your receipt of this Notice. If you do not agree to the specific terms of the proposed Agreed Order, but are willing to enter into a modified Agreed Order, please contact Ms. Debra K. Faulkner of the OSHWM at AC 317/232-7202 within fifteen (15) days of receipt of this Notice to relate your comments or arrange for a conference to discuss this matter further.

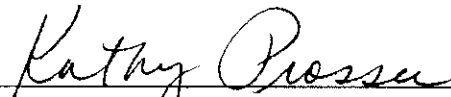
An Equal Opportunity Employer

If settlement is not reached within sixty (60) days of your receipt of this Notice, an Order will be issued pursuant to IC 13-7-11-2(c) containing the actions you must take to achieve compliance, the required time frames, and an appropriate civil penalty.

The advantages of entering into an Agreed Order now, prior to proceedings under IC 13-7-11-2(c), are:

1. At this stage of the proceedings, it is not required that you admit the violations in the Agreed Order as stated.
2. Normally, the assessed civil penalty will be larger if imposed by an ORDER of the Commissioner under IC 13-7-11-2(c).
3. The timely entry into an Agreed Order will prevent the necessity of a formal Order being issued and publicized as required by IC 13-7-11-2(c), or the filing of a civil court action under IC 13-7-5-7.

Dated this 22nd day of December, 1989.


Kathy Prosser
Commissioner

Enclosure

cc: Ms. Sally K. Swanson, U.S. EPA, Region V (with proposed Agreed Order) ✓
Blackford County Health Department (with proposed Agreed Order)
Office of Legal Counsel (with proposed Agreed Order)
Mr. Dennis M. Zawodni (with proposed Agreed Order)
Mr. Stephen C. Hunter (with proposed Agreed Order)
Mr. Jeff W. Stevens (with proposed Agreed Order)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

STATE OF INDIANA)
) SS:
COUNTY OF MARION)
BEFORE THE INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

IN THE MATTER OF THE:

COMMISSIONER,
INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

Complainant

vs.

SHELLER GLOBE CORP.

Respondent

CAUSE NO. H-128

AGREED ORDER

Come now the parties to this cause and, being desirous of settling and compromising this action without hearing or adjudication of any issue of fact or law, hereby consent to the following FINDINGS and ORDER. This document shall not constitute any evidence or admission by any party hereto (which could be used by any third person, nonparty in any other action), but shall be solely for the purposes of settling this action.

FINDINGS

NOW, THEREFORE, upon the consent of the parties hereto, and for the purposes of this cause only, the following FINDINGS are made:

1. The Complainant is the Commissioner of the Indiana Department of Environmental Management (hereinafter referred to as "the Commissioner").
2. The Indiana Department of Environmental Management (hereinafter referred to as the "Department") has jurisdiction over both the parties and the subject matter of this action.
3. Respondent, Sheller Globe Corp. (hereinafter referred to as "Sheller Globe"), is a company authorized to do business in Indiana and operates a place of business at 623 West Monroe Street, Montpelier, Indiana.

An Equal Opportunity Employer

4. Sheller Globe notified the United States Environmental Protection Agency (U.S. EPA) as a generator and treatment, storage, and disposal facility on August 13, 1980. The company notified a second time on May 24, 1985, as a generator of hazardous waste. The company's U.S. EPA Identification Number is IND 006066435.
5. On June 26, 1989, Sheller Globe submitted certification of closure for its hazardous waste container storage areas to the Department.
6. Based upon a record review of the facility on July 8, 1988, by Mr. Jeff W. Stevens of the Office of Solid and Hazardous Waste Management (hereinafter referred to as the "OSHW") of the Department, the Department contends that the following violation was in existence or observed at the time of the record review.
 - a. Pursuant to 329 IAC 3-22-24(a), the owner or operator of a hazardous waste treatment, storage, or disposal facility must demonstrate financial responsibility for claims arising from the operations of said facility from sudden and accidental occurrences that cause injury to persons or property. Based on information gathered by the Department, Respondent has not yet established proof of financial responsibility for claims arising from the operations of said facility from sudden and accidental occurrences that cause injury to persons or property. The facility has lacked liability coverage since August 17, 1987.
7. Based upon an investigation of the facility on March 13, 1989, by Mr. Stephen C. Hunter of the Office of Solid and Hazardous Waste Management (hereinafter referred to as the "OSHW") of the Department, the Department contends that the following violations were in existence or observed at the time of the inspection.
 - a. Pursuant to 329 IAC 3-16-4, an owner or operator must specify in the written waste analysis plan the procedures he will carry out to comply with the requirements of 329 IAC 3-16-4(a). Based on information gathered by the Department, Respondent's waste analysis plan did not adequately describe the frequency of analysis, the sampling method which will be used to obtain a representative sample, and the test methods that will be used to test for waste parameters.
 - b. Pursuant to 329 IAC 3-16-6, the owner or operator inspections shall include the inspection of safety and emergency equipment. Based on information gathered by the Department, Respondent's inspections did not include the inspection of safety and emergency equipment. The facility's inspection schedule did not include all appropriate safety and emergency equipment such as the hazardous material spill kit, turnout gear, disposable clothing and first-aid kit.

- c. Pursuant to 329 IAC 3-16-6, the owner or operator shall develop and follow a written schedule for inspections. Based on information gathered by the Department, Respondent has not followed the written schedule for inspections.
- d. Pursuant to 329 IAC 3-16-6, the inspection log shall contain the name of the inspector. Based on information gathered by the Department, Respondent has not documented the name of the inspector in the inspection log.
- e. Pursuant to 329 IAC 3-16-6, the inspection log shall contain the date and nature of any repairs or remedial actions. Based on information gathered by the Department, Respondent has not documented the date and nature of any repairs or remedial actions in the inspection log.
- f. Pursuant to 329 IAC 3-16-7, the owner or operator shall maintain job titles and the names of the employees filling the positions. Based on information gathered by the Department, Respondent has not maintained a job title and the name of the employee filling the position. Personnel training records did not include the job title of the Human Resources Manager and the records lacked a listing of all employees for each job.
- g. Pursuant to 329 IAC 3-16-7, the owner or operator shall maintain a written job description for each position. Based on information gathered by the Department, Respondent has not maintained a written job description for each position that relates to hazardous waste management.
- h. Pursuant to 329 IAC 3-16-7, the owner or operator shall maintain a written description of the type and amount of both introductory and continuing training given to each employee. Based on information gathered by the Department, Respondent has not maintained a written description of the type and amount of both introductory and continuing training. The description of the introductory and continuing training did not clearly describe the annual review of training.
- i. Pursuant to 329 IAC 3-16-7, the owner or operator shall maintain records that document the training or job description. Based on information gathered by the Department, Respondent has not maintained records that document the training or job description. Personnel training records did not include records of the Emergency Response Team's training in the Emergency Response Team's duties and did not include records of on-the-job training.

- j. Pursuant to 329 IAC 3-16-7, facility personnel must receive initial RCRA training within six (6) months after the date of their employment. Based on information gathered by the Department, Respondent has not provided personnel with initial RCRA training. No RCRA training has been conducted for new employees since February 21, 1987. Mr. Jerry Dulworth (emergency response team) has not received any training and was hired prior to February 1987.
- k. Pursuant to 329 IAC 3-16-7, facility personnel shall participate in an annual review of initial training. Based on information gathered by the Department, Respondent has not given an annual review of initial training to facility personnel. Employees hired prior to February 1987 were last trained on February 21, 1987.
- l. Pursuant to 329 IAC 3-18-3, the contingency plan shall include a list of all emergency equipment at the facility, location of equipment, physical description of each item on the list, and a brief outline of its capabilities. Based on information gathered by the Department, Respondent has not included an adequate description of the location of the fire extinguishers, and a physical description for the emergency equipment in the contingency plan.
- m. Pursuant to 329 IAC 3-18-3, the contingency plan shall list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators. The contingency plan did not include the current home addresses and phone numbers of emergency coordinators. Mr. William Hoyt, currently the emergency coordinator, is not listed in the plan and Mr. Dean Monroe, currently an alternate emergency coordinator, is listed as the emergency coordinator.
- n. Pursuant to 329 IAC 3-19-4, the operating record shall contain a description and the quantity of each hazardous waste received and the methods and dates of each waste's treatment, storage, or disposal. Based on information gathered by the Department, the facility's operating record did not contain the following information: waste stream's common name, U.S. EPA hazardous waste identification number, the waste's physical form, the method (S01) of the waste's storage, and the weight or volume and density of the waste.

- o. Pursuant to 329 IAC 3-19-4, the location and quantity of each hazardous waste within the facility shall be maintained in the operating record. Based on information gathered by the Department, Respondent has not maintained the location and quantity of each hazardous waste within the facility in the operating record. The operating record indicated nineteen (19) containers were located at the container storage pad when twenty (20) containers were present.
- p. Pursuant to 329 IAC 3-8-1 and 329 IAC 3-14-3, the total quantity of wastes and the type and number of containers loaded shall be found on manifests. Based on information gathered by the Department, Respondent has not provided the proper abbreviation for the type of container loaded (used M instead of DM) on Manifest IN 051428.
- q. Pursuant to 329 IAC 3-8-1, manifests shall contain a proper DOT description for waste shipped. Based on information gathered, Respondent did not include the proper DOT description on the manifest for the wastes shipped.
- r. Pursuant to 329 IAC 3-14-3, a generator must identify the waste streams on the manifest. Based on information gathered by the Department, Respondent incorrectly identified waste methyl ethyl ketone (MEK) (F005) as D001 on the manifest.
- s. Pursuant to 329 IAC 3-7-2, a generator is required to determine if his waste is hazardous. Based on information gathered by the Department, Respondent has not determined if the waste in storage and disposed of is hazardous. The Respondent had not made a waste determination on waste cement/naptha used at the extrusion lines and disposed of in dumpsters. Also, two (2) waste streams were incorrectly identified: (a) waste MEK (F005) was incorrectly determined to be a D001 waste, and (b) Lab waste and solvent were incorrectly determined to be D001 instead of the proper F listing (F005 or possibly F003).
- t. Pursuant to 329 IAC 3-10-1, all test results and analyses shall be retained for at least three (3) years. Based on information gathered by the Department, Respondent has not retained all test results and analyses for at least three (3) years. Also, the Respondent has a waste stream described on the manifests as "Waste Combustible Liquid NOS Combustible NA 1993, D001." The facility did not have test results and analysis on file for this waste stream.

- u. Pursuant to 329 IAC 3-9-5, hazardous waste containers shall be clearly marked with start of accumulation date for that container. Based on information gathered by the Department, Respondent has not marked the hazardous waste containers with the date of the start of accumulation. One (1) container of waste trichloroethylene (TCE) maintenance area, two (2) containers of waste naphtha in department 18, and one (1) container of freon and polyblend in the batching area were not marked with the start of accumulation date.
- v. Pursuant to 329 IAC 3-9-5, hazardous waste containers shall be marked with the words "Hazardous Waste." One (1) container of waste TCE in the maintenance area was not marked with the words "Hazardous Waste," and one (1) satellite accumulation five (5)-gallon container in the paint room was not marked with the words "Hazardous Waste" or with other words that identify the contents of the container.
- w. Pursuant to 329 IAC 3-23-4, the containers of hazardous waste shall be stored closed. Based on information gathered by the Department, containers of hazardous waste were not stored closed. One (1) 5-gallon satellite accumulation container in the lab, one (1) 5-gallon satellite accumulation container in the paint room, one (1) container in the maintenance area, one (1) container in the paint room, and one (1) container in the batching area were not stored closed.
- x. Pursuant to 329 IAC 3-23-2, containers shall be stored in good condition. Based on information gathered by the Department, Respondent has not stored containers in good condition. One (1) container of hazardous waste was dented and a second container had a bulging lid while stored on the interim status container storage pad.
- y. Pursuant to 329 IAC 3-16-8, the owner or operator shall post "No Smoking" signs on premises where required. Based on information gathered by the Department, Respondent has not posted "No Smoking" signs on the premises wherever there is a hazard from ignitable or reactive waste.
- z. Pursuant to 329 IAC 3-17-3, the owner or operator shall install portable fire extinguishers, fire control, spill control equipment, and decontamination equipment as required. Based on information gathered by the Department, Respondent has not provided dedicated spark proof shovels.

- aa. Pursuant to 329 IAC 3-23-4, containers must be stored so that they can be inspected for leaks and for deterioration caused by corrosion or other factors, without having to move the containers during the inspection and so that adequate aisle space exists between rows (about two and one-half (2 1/2) feet). Based on information gathered by the Department, Respondent had not provided adequate aisle space at the container storage pad. Containers were stored four (4) wide with no aisle space.
- bb. Pursuant to 329 IAC 3-16-5, danger signs shall be posted at each entrance to the active portions of the facility. Based on information gathered by the Department, Respondent has not posted danger signs at each entrance to the active portions of the facility.
- cc. Pursuant to 329 IAC 3-16-5, security measures shall include 24-hour surveillance or an artificial or natural barrier around the facility with a means to control entry. Based on information gathered by the Department, Respondent has not provided security measures which include 24-hour surveillance or an artificial or natural barrier around the entry. The gates of the perimeter fence were not locked at the time of the inspection.
- dd. Pursuant to 329 IAC 3-17-5, the owner or operator shall provide immediate access to internal alarms. Based on information gathered by the Department, Respondent has not provided immediate access to internal alarms or a communication device for personnel working at the container storage area.
- ee. Pursuant to 329 IAC 3-17-2 and IC 13-7-4, the owner or operator shall manage hazardous wastes to prevent any fire, explosion, or release of hazardous waste or hazardous waste constituents on the premises which could threaten human health or the environment. Based on information gathered by the Department, there is evidence of fire, explosion, or release of hazardous waste or hazardous waste constituents on the premises which could threaten human health or the environment. Numerous minor spills were noted of what appeared to be used oil around the receiving dock on the south side of the plant. A larger spill of a black, oily substance located south of the receiving dock area near the south perimeter fence was noted. Containers of unused recycle solvent (marked "Reclaimed MEK") were stored on and near this spill. At the interim status container storage pad, extensive spillage covered with oil dry was observed on the pad as well as running off the pad.

8. Pursuant to Indiana Code 13-7-11-2(b) and 4-21.5, a Notice of Violation was issued to the Respondent, a copy of which is enclosed and incorporated herein by reference.
9. In recognition of the settlement reached, Respondent waives any right to administrative review of this Agreed Order.

ORDER

WHEREFORE, based upon the above FINDINGS and upon the consent of the parties, it is hereby ORDERED that:

1. Upon the effective date of the Order, Respondent shall cease storage of hazardous waste on-site for greater than ninety (90) days.
2. Within thirty (30) days of the effective date of the Order, Respondent shall revise its waste analysis plan to include the frequency of analysis, the sampling method which will be used to obtain a representative sample, and the test methods that will be used to test for waste parameters.
3. Within thirty-five (35) days of the effective date of the Order, Respondent shall submit a copy of the revised waste analysis plan to the Department for approval.
4. Within thirty (30) days of the effective date of the Order, Respondent shall revise the inspection schedule to include the inspection of all safety and emergency equipment.
5. Within thirty (30) days of the effective date of the Order, Respondent shall maintain the inspector's name in the inspection log.
6. Within thirty (30) days of the effective date of the Order, Respondent shall maintain the date and nature of any repairs or remedial actions in the inspection log.
7. Within thirty (30) days of the effective date of the Order, Respondent shall follow the revised written inspection schedule for inspections and submit a copy to the Department for approval.
8. Within thirty (30) days of the effective date of the Order, Respondent shall develop and maintain personnel training records as required in 329 IAC 3-16-7 and submit a copy to the Department for approval.
9. Within thirty (30) days of the effective date of the Order, Respondent shall ensure personnel complete initial RCRA training and submit documentation of completion of the training to the Department for approval.

10. Within thirty (30) days of the effective date of the Order, Respondent shall ensure that facility personnel participate in an annual review of initial training.
11. Within thirty (30) days of the effective date of the Order, Respondent shall revise the contingency plan to include an adequate description of the location of the fire extinguishers, and a physical description for the emergency equipment on the list.
12. Within thirty (30) days of the effective date of the Order, Respondent shall revise the contingency plan to list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators.
13. Within thirty-five (35) days of the effective date of the Order, Respondent shall submit a copy of the revised contingency plan to the Department for approval.
14. Within thirty (30) days of the effective date of the Order, Respondent shall revise the operating record to include the waste stream's common name, the U.S. EPA hazardous waste identification number, the waste's physical form, the method (S01) of the waste's storage, and the weight or volume and density of the waste. Submit a copy of the revised record to the Department for approval.
15. Within thirty (30) days of the effective date of the Order, Respondent shall revise the operating record to include the location and quantity of each hazardous waste within the facility and submit a copy of the revised record to the Department for approval.
16. Within ten (10) days of the effective date of the Order, Respondent shall submit to the Department and the designated facility a copy of corrected manifest IN 051428 which includes the proper abbreviation for the type of container used and ensure that proper abbreviations are used on all future manifests.
17. Upon the effective date of the Order, Respondent shall ensure that the proper DOT shipping names and hazardous waste codes for the wastes are used on all future manifests. Submit copies of the corrected manifests to the Department and the designated facility.
18. Within thirty (30) days of the effective date of the Order, Respondent shall make a proper waste determination for the waste MEK and for the lab waste and solvent.
19. Within fifteen (15) days of the effective date of the Order, Respondent shall submit information documenting what the waste stream described on the manifests as "Waste Combustible Liquid NOS Combustible NA 1993, D001" is and its correct designation.
20. Upon the effective date of the Order, Respondent shall ensure that all test results and analyses are retained for three (3) years.

21. Upon the effective date of the Order, Respondent shall ensure that all hazardous waste containers in the satellite accumulation areas are marked with the words "Hazardous Waste" or with other words identifying the waste and ensure that all hazardous waste containers in the storage areas are marked with the words "Hazardous Waste."
22. Upon the effective date of the Order, ensure that all hazardous waste containers are clearly marked with the start of accumulation date.
23. Upon the effective date of the Order, Respondent shall ensure that all hazardous waste containers are stored closed.
24. Upon the effective date of the Order, Respondent shall ensure that containers are stored in good condition.
25. Within thirty (30) days of the effective date of the Order, Respondent shall post "No Smoking" signs on premises where required in accordance with 329 IAC 3-16-8.
26. Within thirty (30) days of the effective date of the Order, Respondent shall provide dedicated, spark-proof shovels.
27. Upon the effective date of the Order, Respondent shall provide adequate aisle space as required by 329 IAC 3-23-4.
28. Upon the effective date of the Order, Respondent shall maintain security measures which include 24-hour surveillance or an artificial or natural barrier around the facility with a means to control entry.
29. Upon the effective date of the Order, Respondent shall post danger signs at each entrance to the active portions of the facility.
30. Within thirty (30) days of the effective date of the Order, Respondent shall provide immediate access to internal alarms or a communication device at the container storage area.
31. Within thirty (30) days of the effective date of the Order, Respondent shall remove all visible contamination and visibly contaminated soil. Conduct a waste analysis and make a waste determination for each spill area. Depending upon the waste determination further cleanup and analysis may be required.
32. Within thirty (30) days of the effective date of the Order, Respondent shall pay a civil penalty of \$17,625 to the Indiana Environmental Management Special Fund. This shall be addressed to the Office of Solid and Hazardous Waste Management, Attention: Cashier.

33. In addition to the civil penalty set out above, the Respondent shall pay an additional civil penalty of \$1,000 per day for each day of noncompliance with the time limits set out in this ORDER.
34. The provisions of this AGREED ORDER will apply to the Respondent, its agents, servants, employees, successors, and assigns, and to all persons, firms, or corporations acting through or for the Respondent.
35. This AGREED ORDER will have no force or effect until it is approved by the Commissioner, and timely compliance with the terms of this AGREED ORDER shall constitute a final resolution of this cause.
36. Respondent, by the duly authorized undersigned, hereby consents to the provisions of this FINDINGS and ORDER and agrees to be bound by said ORDER when issued by the Commissioner.

TECHNICAL RECOMMENDATION

BY: Dennis M. Zawodni
Dennis M. Zawodni, Chief
Enforcement Section

DATE: September 28, 1989

Sheller Globe Corp.

BY: _____
Alfred A. Grava
President

DATE: _____

COUNSEL FOR COMPLAINANT

BY: _____

Office of Legal Counsel
Department of Environmental
Management

ATTORNEY FOR RESPONDENT

BY: _____

DATE: _____

APPROVED FOR LEGALITY AND FORM

LINLEY E. PEARSON
Attorney General of Indiana

BY: _____

Deputy Attorney General

DATE: _____

APPROVED AND ADOPTED BY THE INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

this _____ day of _____, 1989.

Kathy Prosser
Commissioner

Enclosure

AUG 14 1989

5HR-12

Mr. Joseph Niedenberger
Plant Manager
Sheller - Globe
623 W. Monroe Street
Montpelier, Indiana 47359

Re: Return to Compliance
Sheller - Globe
IND 006 066 435

Dear Mr. Niedenberger:

We have received and reviewed your letter of July 11, 1989, regarding our Notice of Violation (NOV) dated June 15, 1989.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulation found at 40 CFR 268. We have, therefore, returned this facility to compliance for those violations cited in our NOV.

If you should have any further questions, please contact Mr. Gregory T. Carlson of my staff at (312) 886-8095.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program
Section

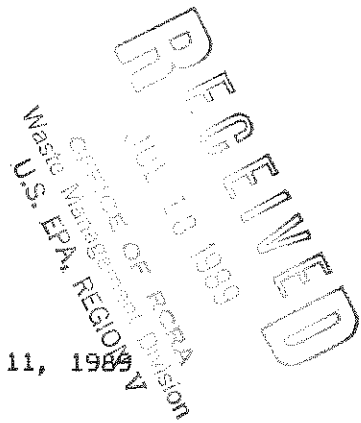
cc: Dennis Zawodni, IDEM

bcc: Sally Swanson, REB

5HR-12:carlson:pw:6-8093::DISK "A":FILENAME: neiden

pw 8/9

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	<i>MC</i> 8/9/89	<i>SKS</i> 8-11-89	



July 11, 1989

Ms. Sally K. Swanson
Chief, IN/MI/OH Enforcement Program Section
U.S. EPA, Region 5
230 South Dearborn Street
Chicago, IL 60604

RE: 5HR-12

Dear Ms. Swanson:

This letter is in response to your agency's Notice of Violation (dated June 15, 1989) concerning our compliance with the land disposal restrictions. This Notice of Violation was the result of an inspection of our facility by the Indiana Department of Environmental Management on March 13, 1989.

In your Notice of Violation, six areas of concern were indicated. We have addressed each of these issues as follows:

- 1) Waste Analysis Plan does address land disposal restriction rules.

Attached is a copy of our Waste Analysis Plan which has been revised to address land ban wastes.

- 2) Failure to provide treatment facilities of complete notification of shipment of F-solvent waste.

We have contacted the treatment facility which handled our F-solvent waste and have obtained copies of our notification for all of 1988 shipments. Copies of these notifications and a copy of the notification with our latest shipment of these F-solvent wastes have been attached for your review.

- 3) Failure to retain copies of notifications sent to treatment facilities.

As indicated in the previous question, a copy of the notification sent with our latest shipment of F-solvent waste has been attached. The revised Waste Analysis Plan requires retaining a copy of these notifications for at least five years.

SHELLER-GLOBE CORPORATION
Montpelier Division

Ms. Sally K. Swanson,
Chief, IN/MI/OH Enforcement Program Section
U.S. EPA, Region 5
July 11, 1989
Page 2

- 4) Operating record does not track the quantity of F-solvent waste entering or leaving the storage area.

Attached is a copy of our revised operating record indicating the movement of F-solvent waste at this facility. Also, enclosed are photographs of F-solvent waste drums presently in the storage area.

- 5) Misclassification of F-solvent wastes (F003 and F005) as D001.

Some of the paints and solvents used at this facility do not contain more than 10 percent of the F-solvents. However, we do use some paints and solvents which contain F-solvent in excess of 10 percent. We are now classifying all solvent waste from our painting operation as F003 and/or F005 in order to ensure compliance with the land disposal restrictions.

- 6) Failure to clearly mark hazardous waste containers to identify its contents and the date of accumulation.

We have experienced problems with the weathering of the markings on our hazardous waste label. We are now using a permanent ink type marker which seems to resist fading. Enclosed are photographs of our hazardous waste drums indicating proper identification.

We hope that this information and documents contained in this response adequately demonstrates with those violations noted in your letter.

If you have any questions or need additional information on this matter, please contact Bill Hoyt at (317) 728-4156.

Sincerely,


Joseph Niedenberger,
Plant Manager

JN/jsc

Attachments

cc: Mr. B. Hoyt - SG Montpelier
Mr. G. Sautter - SG Tech Center

PREINSPECTION FILES AUDIT
CHECKLIST

DATE: 3/9/89

BY: Steve Hunter

COMPANY: Shelby Globe Corporation

LOCATION: 623 W. Monroe St Montpelier IN 47359

I.D.#: IND 100610661435

Type of inspection: G----T----TSD----Closure---Complaint---Other(please specify)

A. GENERAL Grey Simon 782-2441
Terry Seagrave

	YES	NO	NA
1. FEDERAL NOTIFICATION ON FILE? <u>6/03/85</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. FEDERAL PART A ON FILE? <u>4/16/82</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. CLOSURE PLAN REVIEWED?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. CONTINGENCY PLAN REVIEWED?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. BIENNIAL REPORT REVIEWED?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*6. PART B PERMIT REVIEWED?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*(Note any Special Permit Conditions)

Comments:

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

FO01 FO03, DO01, DO03 - Notified

C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

Empty Drums No special waste permits on file

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

None known

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT

F. FEDERAL PART A (Handling Codes), OR PART B PERMIT

4/16/82

	<u>Code</u>	<u>Amount</u>	<u>Unit of Measure</u>
1.	<u>S01</u>	<u>2000 gal</u>	
2.	<u>S03</u>	<u>5000 gal</u>	<u>(scrap rubber pile)</u>
3.			
4.			
5.			

Are there any discrepancies regarding multiple Part A submittals?

G. CLOSURE/POST CLOSURE

Gregory O. Sautter Environmental

1. Any Closed Units: If yes, describe:

Closure Plan Submitted 10/24/86. Approved 6/29/88.
Request 90 day reb. 1/25/89. Inside storage area
Outside storage area

H. COMPLIANCE HISTORY

List past two inspections and enforcement actions (CO, NOV, VL, WL)

<u>Date of inspection</u>	<u>Action type</u>	<u>Date of Action</u>
<u>6/2/87</u>	<u>NOI 7/6/87</u>	<u>NOC 12/14/87</u>
<u>9/26/85</u>	<u>NOV (217)</u>	
	<u>6/13/86 NOI</u>	
	<u>10/21/86 NOI</u>	
	<u>7/3/87 NOV (479) F.A.</u>	
	<u>4/30/87 NOC</u>	

NOI 7/6/87

I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

None

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS. NOTE IF THEY ARE REPEATS.

*Waste Analysis Plan, Improper Schedule, Contingency Plan
Personnel Trainings & records, Containers not closed*

K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR
NEED FIELD VERIFIED

L. COMMENTS

1987 - Oil & Solvent D001

Methylene Chloride F001

Waste Paint & Solvent D001

Solvent F005

Chlorinated Solvent F001

Waste Dicyclohexylmethane D003



CONVERSATION RECORD

TIME

2:15

DATE

6/7/89

TYPE

☐ VISIT

☐ CONFERENCE

☒ TELEPHONE

☐ INCOMING

☐ OUTGOING

ROUTING

NAME/SYMBOL

INT

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Steve Hunter

ORGANIZATION (Office, dept., bureau, etc.)

IDEM

TELEPHONE NO.

317
232-4416

SUBJECT

Sheller-Globe Corp. 1ND006 066435

SUMMARY

Sheller-Globe Corp. has sought to close its interim status storage facility, ie, Bldg #25. SGC submitted a closure plan for container storage area on 10/24/86. Modified closure plan approved 6/29/88. Requested 90 day extension 1/25/89. SGC has communicated to IDEM via letter that they were acting as generators and that storage pad had been decontaminated. IDEM 3/13/89 CEI inspection found storage > 90 days and extensive spillage on storage pad.

ACTION REQUIRED

NAME OF PERSON DOCUMENTING CONVERSATION

Gree Carlson

SIGNATURE

[Signature]

DATE

6/8/89

ACTION TAKEN

SIGNATURE

TITLE

DATE

QUB

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Skeller Globe Corporation

U.S. EPA I.D. No.: IND006066435

Street: 623 West Monroe Street

City: Montpelier State: Indiana Zip Code: 47359

Telephone: (317) 728-4081

Operator: Same as above

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: Same as above

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 3/13/89 Time: 815 - 500 Weather Conditions: Cool

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>Stephen C Hunter</u>	<u>IDEM/OSAWM</u>	<u>(317) 232-4416</u>
	<u>Mike Wilhelm</u>	<u>" "</u>	<u>" 232-4402</u>

Facility Representatives: Dean Monroe (317) 728-4081

William Hoyt (317) 728-4156

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u>	<u>First Third</u>
			<u>California List</u>	
Generator	_____	<u>✓</u>	_____	_____
Transporter	_____	_____	_____	_____
Treater	_____	_____	_____	_____
Storer	_____	<u>✓</u>	_____	_____
Disposer	_____	_____	_____	_____

INSPECTION SUMMARY

Sheller Globe manufactures rubber gaskets for use in the automotive industry. Processes include mixing, extruding, forming, painting, and parts cleaning. The company generates waste solvents from painting, and line flushing operation, and lab analysis / QAQC for products. The company has interim storage for containers but received approval of a modified closure plan on 6/29/88. The company has not certified closure but intends to do so. Two drums of haz waste were in the container storage area for greater than 90 days at the time of inspection.

RCRA LAND DISPOSAL RESTRICTION INSPECTION
APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
A. <u>F-Solvent Wastes</u>					
1. F001	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>	<u> </u>
2. F002	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
3. F003	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
4. F004	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
5. F005	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>	<u> </u>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified *ALL*

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Cadmium	100 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Chromium VI	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Lead	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Mercury	20 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Nickel	134 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Selenium	100 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Thallium	130 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L *N/A*

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0 *N/A*

_____	_____	_____	_____	_____
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4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to *N/A*

50 ppm _____	_____	_____	_____	_____
--------------	-------	-------	-------	-------

500 ppm _____	_____	_____	_____	_____
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Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No *✓* NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids) *N/A*

_____	_____	_____	_____	_____
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Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

N/A

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047*	_____	_____	_____	_____	_____
K048*	_____	_____	_____	_____	_____
K049*	_____	_____	_____	_____	_____
K050*	_____	_____	_____	_____	_____
K051*	_____	_____	_____	_____	_____
K052*	_____	_____	_____	_____	_____
K060*	_____	_____	_____	_____	_____
K061*	_____	_____	_____	_____	_____
K062*	_____	_____	_____	_____	_____
K069*	_____	_____	_____	_____	_____
K071*	_____	_____	_____	_____	_____
K073*	_____	_____	_____	_____	_____
K083*	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086*	_____	_____	_____	_____	_____
K087*	_____	_____	_____	_____	_____
K099*	_____	_____	_____	_____	_____
K100*	_____	_____	_____	_____	_____
K101*	_____	_____	_____	_____	_____
K102*	_____	_____	_____	_____	_____
K103*	_____	_____	_____	_____	_____
K104*	_____	_____	_____	_____	_____
K106*	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

GEN

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
- ☐ Pharmaceutical wastewater containing
- ☒ spent methylene chloride
- ☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste? *W/A*

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_____ Yes _____ No ☒ NA

If yes, check the appropriate treatability group.

_____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
 _____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes _____ No _____ NA

How was this determination made?

- Knowledge of waste

☒ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. M505

- TCLP

_____ Yes ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

*Waste from / solvent
Waste trichloroethylene
Lab Waste solvents thinner*

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

N/A

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing _____ Yes _____ No _____ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes: *N/A*

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

_____ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

_____ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

_____ Yes _____ No _____ NA

- Total Constituent Analysis

_____ Yes _____ No _____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test the waste when a process or waste stream changes?

C. Management**1. On-Site Management**

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes _____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes _____ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes _____ No

c. Does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ NoApplicable treatment standards ☒ Yes ☐ NoManifest number ☐ Yes ☒ NoWaste analysis data, if available ☒ Yes ☐ NoIdentify off-site treatment or storage facilities: American Resource
Recovery, Memphis Tennessee

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No *N/A*

f. Does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ NoApplicable treatment standards ☐ Yes ☐ NoManifest number ☐ Yes ☐ NoWaste analysis data, if available ☐ Yes ☐ NoCertification that the waste meets treatment standards ☐ Yes ☐ NoIdentify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☒ No ☐ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No *N/A*

- N/A*
- i. If yes, does the notification contain the following information?

EPA Hazardous waste number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
The corresponding treatment standards and all applicable prohibitions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Date the waste is subject to the prohibitions	<input type="checkbox"/> Yes	<input type="checkbox"/> No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?
- ☐ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes

- N/A*
- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?
- ☐ Yes ☐ No
- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Addresses	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Telephone Numbers	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Contact dates	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?
- ☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data, if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes

(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

N/A

- Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ No

If yes, list types of waste treatment units and processes:

TSD

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☒ No ☐ NA
 o California List ☐ Yes ☒ No ☐ NA
 o First Third ☐ Yes ☒ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☐ Yes ☒ No

Based on knowledge

- a. What date was the waste analysis plan last revised? 7/87

- b. Are analyses conducted on-site or off-site? N/A
☐ On-site ☐ Off-site

Identify off-site lab: _____

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified EDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☐ No ☒ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

____ Yes ☒ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

____ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

____ Yes ☒ No ____ NA

2 drums of F solvent not dated

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

____ Yes ☒ No *no quantity*

5. Do operating records agree with container labeling?

☒ Yes ____ No ____ NA
Dates on drums differ from dates in operating log

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

____ Yes ☒ No

Hasn't kept copy as generator of notices required for F listed solvent when for faulty ships offsite for disposal

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ☒ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No *NA*

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No ☒ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ☒ NA

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

☐ Yes ☐ No ☐ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

☐ Yes ☐ No

D. Treatment in Surface Impoundments *N/A*

1. Are restricted wastes placed in surface impoundments for treatment?

☐ Yes ☐ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

☐ Yes ☐ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

☐ Yes ☐ No ☐ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

☐ Yes ☐ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

☐ Yes ☐ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal *N/A*

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

TSD - RCRA INSPECTION REPORT

EPA ID # IND006066435 NAME Sheller Globe Corporation

MAILING ADDRESS: 623 West Monroe Street
Montpelier, Indiana 47359

LOCATION ADDRESS: Same as above

CONTACT: Mr. Dean Monroe PHONE: (317) 728-4081

OWNERSHIP: Same as above COUNTY: Blackford

STATUS CODE: 1 1=Active 3=Dead Mail 4=PCB handler
6=non-handler 2=Obsolete ID # 9=Superfund site
5=Out of business

ACTIVITY: (This should reflect the actual functioning of the facility)

LQG X SQG CEG TRANSPORTER TSD X UI

TRANSPORTERS: Air Rail Hwy Water Other

HAZARDOUS WASTE FUEL : Gen mktg burner other mktg burner
DFF SPEC USED OIL FUEL : Gen mktg burner other mktg burner
SPEC USED OIL FUEL MKTR :
BURNING DEVICE : Util boiler Indus boiler Indus furn

Person(s) interviewed: Title: Telephone:
Mr. Dean Monroe Human Resources Manager (317) 728-4081
Mr. William Hoyt Manufacturing Manager (317) 728-4156

Inspector(s): Agency: Telephone:
Mr. Stephen C. Hunter IDEM/OSHWm (317) 232-4416
Mr. Mike Wilhelms IDEM/OSHWm (317) 232-4402

Date of inspection: March 13, 1989 Time of inspection: 8:15 A.M. - 5:00 P.M.

Installation Processes by Process Code (EPA Form 3510-3)

S01 <input checked="" type="checkbox"/>	Container storage	T03 <input type="checkbox"/>	Incinerator treatment
S02 <input type="checkbox"/>	Tank storage	T04 <input type="checkbox"/>	Other treatment
S03 <input type="checkbox"/>	Waste pile storage	D79 <input type="checkbox"/>	Injection well disposal
S04 <input type="checkbox"/>	Surface impoundment storage	D80 <input type="checkbox"/>	Landfill disposal
T01 <input type="checkbox"/>	Tank treatment	D81 <input type="checkbox"/>	Land application disposal
T02 <input type="checkbox"/>	Surface impoundment treatment	D83 <input type="checkbox"/>	Surface impoundment disposal

If Part A process codes are listed above as T04 please describe the process involved below:

- 1) Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application. (HWIMS 610)
- 2) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.
- 3) Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or non-hazardous)!

See trip report

- 4) If any of the wastes are managed in the manners listed below, please check those areas and utilize the provided appendices.

	<u>YES</u>	<u>NO</u>
A) Waste Oil Fuel - Appendix A	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Lead Acid Batteries - Appendix B	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C) Hazardous Waste Fuel - Appendix C	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D) Precious Metals - Appendix D	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E) Use Constituting Disposal - Appendix E	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F) Tanks	<input type="checkbox"/>	<input checked="" type="checkbox"/>
G) Use and Management of Containers	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	YES	NO
H) Generator Accumulation Appendix	<u>✓</u>	<u>—</u>
I) Waste Pile	<u>—</u>	<u>✓</u>
J) Surface Impoundment	<u>—</u>	<u>✓</u>
K) Landfill	<u>—</u>	<u>—</u>

5) Hazardous Waste Streams/EPA #

Source

Rate

Disposition

- 1. Naphtha / D001	Rubber Solvent	}	American Resource Recovery, Memphis Tenn
- 2. Waste Paint / D001	Z-306 Painting		
- 3. Waste Paint / MEK F005	Painting	} See (1) below	↓
- 4. Lab Waste Solvent / F003, F005	Lab		
- 5. Trichloroethylene / F001	Maintenance	} See (2) below	
- 6. Waste Gunk / F001	Pipe Seal Flushing		
- 7. Waste Freon / Polyblend F001	Urethane mix & Lines		

6) List all wastes not listed above.

Waste	Process Generating Waste	Rate	Disposition
Scrap Rubber	Deffecting, turning	Recd, disposed at Blackford County Landfill	
Paint Filter	Painting	Disposed - Blackford Co. Landfill	
Oil	Hydraulic, Grease		American Resource Recovery
	Canbury		

① The company has shipped offsite ^{within the last 23 months} or has an onsite storage 112 drums of D001 waste. However the company incorrectly determined Waste Stream # 3 & #4 to be D001 waste streams. Therefore waste streams # 3 & #4 included in the 112 drum total.

② The company has shipped offsite within the last 23 months or has in on-site storage 36 drums of F001 waste. However due to manifest deficiencies (failure to use proper DOT shipping name) and the failure of the facility to differentiate waste streams in records other than as D001 & F001 it is impossible to determine generation rates of individual waste streams.³

- 7) If the company claims a reuse or reclaim exemption please include the following information:

	<u>Waste Type</u>	<u>Generation Rate</u>	<u>How reclaimed & by Who</u>	<u>Quantity stored on Site</u>
A.	<u>N/A</u>			
B.				

8) Hazardous Waste On-Site

	<u>Amount</u>	<u>How Stored</u>	<u>Comments</u>
<u>Waste Trichloroethylene</u>	<u>1</u>	<u>55 gal drum</u>	<u>Partially full</u>
<u>Waste Naptha</u>	<u>2</u>	<u>55 gal dr</u>	<u>1 Full, 1 Partially full</u>
<u>Waste Paint/MEK</u>	<u>1</u>	<u>55 gal dr</u>	<u>Partially Full</u>
<u>Waste Polyblend/Freon</u>	<u>1</u>	<u>55 gal drum</u>	<u>↓</u>
<u>Lab waste/solvent</u>	<u>1</u>	<u>15 gal container</u>	
<u>SOI</u>	<u>See pg. 5</u>		

- 9) Has the capacity of the storage areas listed on the Part A exceeded that allowed? List the type and amount of actual storage capacity overages.
329 IAC 3-38-2 (HWIMS 610)

- 10) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occurred)
 (40 CFR 270.13 and 329 IAC 3-34-4) (HWIMS 610)

- 11) Is the Biennial Report Accurate? OK

- 12) Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.)

None noted

13) Additional Comments:

1) Drum Storage Pad (Interim Status)

Inventory - 1 drum M-Pyrol

a) Seven drums marked F001

1) Three not dated, one dated 12-8-88

b) Twelve drums marked D001

1) One dated 12-8-88

2) One dented side, one drum bulged top

c) Numerous drums of non-haz used oil

2) Naptha Storage Shed (Interim Status)

a) 3 containers of lubricant/solvent

Material (Appeared to be used oil) spilled all around receiving dock (south side) area. A large spill of black, oily substance on ground south of the Receiving Dock Area near the south boundary fence. Drums of unused Recycled solvent ^(marked Reclaimed MEX) are on the discolored area

Company submitted a closure plan for container storage on 10/24/86. Modified closure plan approved 6/29/88. Requested 90 day extension 1/25/89. Company intends to close and act as solely SQ6. However the container storage pad has evidence of ^{extensive} spillage of some contaminants on the pad and two drums had been stored more than 90 days. In addition it is ^{waste currently in storage} ~~unleary, based upon current generation~~ ^{and the past 23 months offsite} ~~generator~~ ^{if} ~~generator~~ ^{segments} of the company could qualify as a small quantity generator after closure.

General Facility Standards (paperwork)

		<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1)	Has the Regional Administrator/Environmental Management Board been notified regarding:				
a.	Receipt of hazardous waste from a foreign source? 40 CFR 265.12(a) (329 IAC 3-16-3) (HWIMS 300)	—	—	—	✓
b.	Facility expansion? 40 CFR 270.72(b) (329 IAC 3-38-3) (HWIMS 610)	—	—	—	✓
c.	Change of owner or operator? 40 CFR 265.12(b) (329 IAC 3-16-3) (HWIMS 300)	—	—	—	✓

Mr. Monroe first gave me a W.A.P. & Contingency Plan dated 1/18/86, then one dated 1/18/86, then finally dated 7/87. He did not know and was confused which one was correct.

2)	General Waste Analysis:	(HWIMS 310)				
a.	Has the owner or operator made a detailed chemical and physical analysis of the waste either through testing or knowledge of the process? 40 CFR 265.13(a) (329 IAC 3-16-4)	✓	—	—	—	
b.	Does the owner or operator have a detailed waste analysis plan on file at the facility? 40 CFR 265.13(b) (329 IAC 3-16-4)	✓	—	—	—	
	Does the waste analysis plan contain:					
	1. parameters (and rationale for their choice)	✓	—	—	—	
	2. test methods	—	✓	—	—	I 31
	3. sampling method for representative sample	—	✓	—	—	I 31
	4. frequency of analysis (and rationale)	—	✓	—	—	I 31
	5. <u>off-site only</u> : waste analysis from generators	—	—	—	—	
	6. Additional waste analysis needed (when a change in waste type or process occurs)	—	—	—	✓	
a.	<u>265.193 (329 IAC 3-24-3) Tanks</u> (see above)	—	—	—	—	
b.	<u>265.225 (329 IAC 3-25-4) Impoundment</u> (same as above)	—	—	—	—	
c.	<u>265.252 (329 IAC 3-26-3) Waste Pile</u> (same as above)	—	—	—	—	
d.	<u>265.273 (329 IAC 3-27-3) Land Treatment</u> (same as above)	—	—	—	—	
e.	<u>265.341 (329 IAC 3-29-2) Incinerators</u> (same as above)	—	—	—	—	

	OK	DF	NI	NA
f. <u>265.375 (329 IAC 3-30-3) Thermal Treatment</u> (same as above)	—	—	—	✓
g. <u>265.402 (329 IAC 3-31-3) Other Treatment</u> (same as above)	—	—	—	✓

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?
40 CFR 265.13(c) (329 IAC 3-16-4) — — — ✓

d. Is the waste analysis plan followed? OK

3) Owner or Operator Inspections: (HWIMS 320)

a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment?
40 CFR 265.15(a) (329 IAC 3-16-6) ✓ — — —

b. Does the owner or operator have an inspection schedule at the facility?
40 CFR 265.15(b)2 (329 IAC 3-16-6) ✓ — — —

c. If so, does the schedule address the inspection of the following items:
40 CFR 265.15(b)1 (329 IAC 3-16-6)

i. monitoring equipment? — — — ✓

ii. safety and emergency equipment? — ✓ — — 320 II

iii. security devices (including fences)? ✓ — — —

iv. operating and structural equipment (ie. dikes, pumps, etc.)? ✓ — — —

v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)?
40 CFR 265.15(b)(2) (329 IAC 3-16-6) ✓ — — —

ii Hazardous material Spill Kit, Turnout Gear, First-Aid Kit, Disposable Clothing listed in Contingency Plan as Emergency Equipment but not in schedule.

	OK	DF	NI	NA
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? 40 CFR 265.15(b)(4) (329 IAC 3-16-6)	✓	—	—	—

vii. Must include:

- | | | | | |
|---|---|---|---|---|
| 1. Weekly container storage?
(See 265.174) (329 IAC 3-23-5) | ✓ | — | — | — |
| 2. Daily and Weekly Tank Storage?
(See 265.194) (329 IAC 3-24-4) | — | — | — | ✓ |
| 3. Daily freeboard and weekly dike inspection for surface impoundments?
(See 265.226) (329 IAC 3-25-5) | — | — | — | ✓ |
| 4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely)
[See 265.15(b)(4) (329 IAC 3-16-6)] | — | — | — | ✓ |

d. Does Owner or Operator follow the written inspection schedule as outlined? 265.15(b)(1) (329 IAC 3-16-6)	—	✓	—	—	320 II
--	---	---	---	---	--------

e. Are areas subject to spills inspected daily when in use? 265.15(b)(4) (329 IAC 3-16-6)	✓	—	—	—	
--	---	---	---	---	--

(on per Mr. Hoyt)
d) Last inspection conducted 8/13/88pt that inspection emergency equipment no checked for proper location & if damaged or deteriorated.
Some Emergency equipment not shovels, absorbent not located where contingency plan says.

f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? 40 CFR 265.15(d) (329 IAC 3-16-6)	—	✓	—	—	320 I
--	---	---	---	---	-------

Inspections not logged weekly - often only every 2 weeks

g. Does the inspection log contain the following information: 40 CFR 265.15(d) (329 IAC 3-16-6)					
--	--	--	--	--	--

i. the date and time of the inspection?	✓	—	—	—	
---	---	---	---	---	--

ii. the name of the inspector?	—	✓	—	—	320 II
--------------------------------	---	---	---	---	--------

iii Log often just initialed by inspector

OK DF NI NA

iii. a notation of the observations made?

☒ ☐ ☐ ☐

iv. the date and nature of any repairs or remedial actions?

☐ ☒ ☐ 320 II

iv) Correction taken and the date and nature of repairs
not noted on log. (observed & agreed to by Mr. [unclear])

4) Do personnel training records include: (HWIMS 330)

a. Job titles for the positions related to HWM
40 CFR 265.16(d)1 (329 IAC 3-16-7)

☒ ☐ ☐ 330 II

Not for Human Resource Manager (A.H.E.C.)

b. The name of the employees filling each job title?
40 CFR 265.16(d)(1) (329 IAC 3-16-7)

☒ ☐ ☐ 330 II

No listing of all employees for each job

c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position?
40 CFR 265.16(d)2 (329 IAC 3-16-7)

☒ ☐ ☐ 330 II

Not RCRA specific duties

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator ☒ Training coordinator ☒ Emergency response personnel ☒
Inspectors ☐ Material handlers ☒ Container labelers ☒ Manifesters No
Recordkeepers ☐

d. Description of both introductory and continuing training required for each job?
40 CFR 265.16(d)(3) (329 IAC 3-16-7)

☐ ☒ ☐ 330 II

Describe in general the type of training program in use at the facility.

d. Not clear what annual review will be. Also states all plant personnel will be trained in RCRA

e) No records for OTS training and no records of Emergency Response Team training for Emergency Response Team members.

e. Records of training required in (d)?
40 CFR 265.16(d)4 (329 IAC 3-16-7)

☒ ☐ ☐ 330 II

Mr. Bob Smith - Dept 18 Utility Worker Last trained 2/21/87
 Mr. Steve Taylor Maintenance Mechanic 2/21/87
 Mr. Jerry Culworth - 2nd shift superintendent - 2 Not trained

f. Did facility personnel receive the required training including:

	OK	DF	NI	NA	
i) classroom or on the job	—	✓	—	—	I 330
ii) within 6 months of hire	—	✓	—	—	I ↓
iii) annual review of training?	—	✓	—	—	I

g. Are all training records maintained for current personnel and for at least three years for former employees?

✓ — — —

40 CFR 265.16(e) [329 IAC 3-16-7(e)]

f. i No all plant personnel trained in contingency plan as described in the description of training. Mr. Jerry Culworth (emergency response team) is not trained.

No training conducted except for OHS training since 2/21/87 for new and old employees. No annual review since 2/21/87

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(HWIMS 350)

1) Does the Contingency Plan contain the following information:

a. The actions facility personnel must take to comply with 265.51 (3-18-2) and 265.56 (3-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable). ✓ — — —

A. A description of arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services. 329 IAC 3-18-3 ✓ — — —

i. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators? — ✓ — — 350 II

ii. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? — ✓ — — 350 II
 40 CFR 265.52(e) (329 IAC 3-18-3)

*ii No physical description, Lack adequate location for fire extinguishers.
 note - Shovel, absorbent not where plan indicates.*

iii. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) OK DF NI NA
40 CFR 265.52(f) (329 IAC 3-18-3) ✓

Not Part of Plan - SOP's

2) Emergency Coordinator:

a. Is the facility Emergency Coordinator identified? ✓ 350 II
40 CFR 265.52(d) (329 IAC 3-18-3)

b. Is coordinator familiar with all aspects of site operation and emergency procedures? ✓
40 CFR 265.55 (329 IAC 3-18-6)

c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? ✓
40 CFR 265.55 (329 IAC 3-18-6)

20 *Currently Mr Dean Monroe is alt E.C. not E.C. as in plan*
Mr. William Hoyt Smith identified previously as currently
Emergency Coordinator

Preparedness and Prevention

1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? ✓
40 CFR 265.37 (329 IAC 3-17-7) (HWIMS 340)

2) Are copies of the Contingency Plan available at the site and local emergency organizations? ✓
40 CFR 265.53 (329 IAC 3-18-4) (HWIMS 350)

3) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (329 IAC 3-18-7)? ✓
 (HWIMS 350)

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

- | | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|-------|---|-----------|-----------|-----------|-----------|
| 1) | Use of Manifest System: (HWIMS 360) | | | | |
| a. | Does the facility follow the procedures listed in 265.71 (3-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.) | — | — | — | ✓ |
| b. | Are records of past shipments retained for three (3) years?
40 CFR 265.71(b)5 (329 IAC 3-19-2) | — | — | — | ✓ |
| 2) | Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only)
40 CFR 265.72 (329 IAC 3-19-3) | — | — | — | ✓ |
| 3) | Unmanifested Waste Reports:
(applies only to Off-site facilities) | | | | |
| a. | Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (3-8-1) without a manifest or shipping paper?
40 CFR 265.76 (329 IAC 3-19-7) | — | — | — | ✓ |
| b. | If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment. | — | — | — | ✓ |
| c. | Has the facility submitted 8700-13B (unmanifested waste report)? | — | — | — | ✓ |
| <hr/> | | | | | |
| <hr/> | | | | | |
| <hr/> | | | | | |
| 4) | Closure/Post Closure | | | | |
| a. | Is the closure plan available for inspection?
40 CFR 265.112(a) (329 IAC 3-21-3) (HWIMS 390) | ✓ | — | — | — |
| b. | Is the post-closure plan available for inspection? (for disposal facilities only)
40 CFR 265.118(a) (329 IAC 3-21-8) (HWIMS 390) | — | — | — | ✓ |
| c. | Has the closure cost and post closure cost estimate been revised annually to account for inflation.
(HWIMS 400) | ✓ | — | — | — |

5) Operating Record:

(HWIMS 370)

OK DF NI NA

a. Does owner or operator have a operating record?
40 CFR 265.73(a)

✓ — — —

b. Does the owner or operator maintain an operating record that contains the following information?

i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (329 IAC 3-32-2)?
40 CFR 265.73(b)(1) (329 IAC 3-19-4)

— ✓ — — 370 II

Summarize how the facility tracks the method and date of TSD activity.

Does not meet Appendix I, include method, or date of storage. See pg 30-32 for copy of operating log

ii. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.)
40 CFR 265.73(b)(2) (329 IAC 3-19-4)

— ✓ — — 370 II

Summarize how the facility tracks the location and quantity of waste.

Does not meet Appendix I on quantity (ie gallons) and log one drum short on storage pad count because failed to note that a drum had been moved to the storage pad - drum # 281

iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.)
40 CFR 265.73(b)(2) (329 IAC 3-19-4)

— — — ✓

iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections?
40 CFR 265.73(b)(3)(5)(6) (329 IAC 3-19-4)

✓ — — —

v. Reports detailing all incidents that required implementation of the Contingency Plan?
40 CFR 265.73(b)(4) (329 IAC 3-19-4)

— — — ✓

vi. All closure and post closure costs as applicable?
40 CFR 265.73(b)(7) (329 IAC 3-19-4)

✓ — — —

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

		<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1)	Has the owner or operator of the facility implemented a groundwater monitoring system? <u>40 CFR 265.90(a) (329 IAC 3-20-1)</u> (HWIMS 380)	—	—	—	<input checked="" type="checkbox"/>
2)	Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in <u>265.90(d) (329 IAC 3-20-1)</u> ? (HWIMS 380)	—	—	—	<input checked="" type="checkbox"/>
<hr/>					
<hr/>					
<hr/>					

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

<u>Manifest Requirements:</u>	(HWIMS 110)	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1) Does the operator have copies of the manifest available for review? <u>40 CFR 262.40 (329 IAC 3-10-1)</u>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Examine manifests for shipments in past ²³ 6 months. Indicate approximate number of manifested shipments during that period		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>6</u>
3) Do the manifest forms examined contain the following information. <u>40 CFR 262.21 (329 IAC 3-8-1)</u>					
a. Manifest document number? EPA ID No. + Unique 5 digit No. (A sequential number for all manifests before September 20, 1984, and a five digit unique number after September 20, 1984.)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Name, mailing address, telephone number, and EPA ID number of generator?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Name, telephone number (3-14-3) and EPA ID Number of Transporter(s)?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Name, Address, telephone number (3-14-3) and EPA ID Number of designated permitted facility?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. The total quantity of waste(s) and the type and number of containers loaded?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Required certification?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Required signatures?		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. EPA hazardous waste number (3-14-3)?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

110 I

110 I

110 I

f) Manifest IW, C5 1428 company used incorrect type of container

i) All manifests ^{in the past} incorrectly used DOT to describe Waste Paint/MER FOOS Waste stream and tot

l) Manifests do not have the proper DOT description at least for Proper Shipping Name (Waste Naptha, Waste trichloroethylene, waste paint (related materials) etc

- 4) **Reportable exceptions:**
40 CFR 262.42 (329 IAC 3-10-3) (HWIMS 180)
- a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. - 0 -
- b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (329 IAC 3-10-3) to the Regional Administrator.

NIA

INTERNATIONAL SHIPMENTS:

(HWIMS 190)

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 1) Has the installation imported or exported hazardous waste?
<u>40 CFR 262.50 (329 IAC 3-11-1)</u>
(If answered Yes, complete the following as applicable.) | ___ | ___ | ___ | ✓
___ |
| a. Exporting hazardous waste; has a generator: | | | | |
| i. Notified the administrator in writing? | ___ | ___ | ___ | ✓
___ |
| ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? | ___ | ___ | ___ | ✓
___ |
| iii. Met the Manifest requirements? | ___ | ___ | ___ | ✓
___ |
| b. Importing hazardous waste; has the generator met the manifest requirements? | ___ | ___ | ___ | ✓
___ |

RECORDKEEPING AND REPORTING:

- 1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility?
40 CFR 262.11 (329 IAC 3-7-2) (HWIMS 100)

___ ✓ ___ 100 I

*Lab Waste / Solvent incorrectly id as D001 instead of F005. Waste Paint / MEK incorrectly id as D001.
 waste determination not made on Cement / Naphtha used at the extrusion lines.*

2) Has the generator submitted biennial reports and exception reports as required?
329 IAC 3-10-2 and 329 IAC 3-10-3 (HWIMS 180/360) OK DF NI NA

3) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?
40 CFR 262.40 (329 IAC 3-10-1) (HWIMS 180)

OK DF NI NA 180 II

No records of waste stream shipped out as -
Waste Combustible Liquid N.O.S. Combustible NA1993, D001.
Mr. Hoyt says that it is used oil but no records

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

*See Closure Plan + Part A for
Site maps*

Remember to take photos and document as well as possible all violations!!!

5015S
kaw
1/31/89

1 drum waste 1-1-1 Triethoxyethylene

Generator Accumulation Appendix

Location of Unit Maintenance Area

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
<u>40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)</u> | — | — | — | — |
| <hr/> | | | | |
| 2) Is the container clearly marked with the start of accumulation date?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | ✓ | — | 120I |
| 3) Have more than 90 days elapsed since the date inspected in (a)?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | — | ✓ | — |
| 4) Do wastes remain in accumulation tanks for more than 90 days?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | — | — | ✓ |
| 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | ✓ | — | 120I |
| <hr/> | | | | |
| <hr/> | | | | |
| <hr/> | | | | |

Satellite Accumulation

- | | | | | |
|--|---|---|---|---|
| 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
<u>40 CFR 262.34 (329 IAC 3-9-5 (c))</u> | — | — | — | — |
| 2) Are containers in good condition, compatible with the wastes in them and stored closed?
<u>40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))</u> | — | — | — | — |
| <hr/> | | | | |
| <hr/> | | | | |

2 drums of waste naphtha (1 full, 1 partial)

Generator Accumulation Appendix

Location of Unit Sept. 18 Transfer Splice

OK DF NI NA

- 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)

— — — —

- 2) Is the container clearly marked with the start of accumulation date?
40 CFR 262.34 (329 IAC 3-9-5)

— ☒ — — 120 I

- 3) Have more than 90 days elapsed since the date inspected in (a)?
40 CFR 262.34 (329 IAC 3-9-5)

— — ☒ —

- 4) Do wastes remain in accumulation tanks for more than 90 days?
40 CFR 262.34 (329 IAC 3-9-5)

— — — ☒

- 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
40 CFR 262.34 (329 IAC 3-9-5)

☒ — — —

2) Both drums not dated - both closed

Satellite Accumulation

- 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
40 CFR 262.34 (329 IAC 3-9-5 (c))

— — — —

- 2) Are containers in good condition, compatible with the wastes in them and stored closed?
40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))

— — — —

1 drum waste paint/MEK

1-5 gal pail paint/waste MEK (satellite)

Generator Accumulation Appendix

Location of Unit Paint Room

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
<u>40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)</u> | — | — | — | — |
| <hr/> | | | | |
| 2) Is the container clearly marked with the start of accumulation date?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — ✓ — | — | — | — |
| 3) Have more than 90 days elapsed since the date inspected in (a)?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — ✓ — | — | — | — |
| 4) Do wastes remain in accumulation tanks for more than 90 days?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | — | — | — ✓ |
| 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — ✓ — | — | — | — |

Drum not closed - corrected

Satellite Accumulation

1-5 gal pail

- | | | | | | |
|--|---|-------|---|---|-------------|
| 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
<u>40 CFR 262.34 (329 IAC 3-9-5 (c))</u> | — | — ✓ — | — | — | <u>T/20</u> |
| 2) Are containers in good condition, compatible with the wastes in them and stored closed?
<u>40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))</u> | — | — ✓ — | — | — | <u>T/20</u> |

1/2) 5 gal pail not marked or closed

1 drum waste Polyblend/Freon

Generator Accumulation Appendix

Location of Unit Batching Area

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? <u>40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)</u>	—	—	—	—
<hr/>				
2) Is the container clearly marked with the start of accumulation date? <u>40 CFR 262.34 (329 IAC 3-9-5)</u>	—	✓	—	— I/26
3) Have more than 90 days elapsed since the date inspected in (a)? <u>40 CFR 262.34 (329 IAC 3-9-5)</u>	—	—	✓	—
4) Do wastes remain in accumulation tanks for more than 90 days? <u>40 CFR 262.34 (329 IAC 3-9-5)</u>	—	—	—	✓
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? <u>40 CFR 262.34 (329 IAC 3-9-5)</u>	✓	—	—	—
<u>Drum not dated or closed</u>				

Satellite Accumulation

1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? <u>40 CFR 262.34 (329 IAC 3-9-5 (c))</u>	—	—	—	—
2) Are containers in good condition, compatible with the wastes in them and stored closed? <u>40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))</u>	—	—	—	—

Use and Management of Containers

Location of Unit Maintenance Area, Transfer Splice Dept. 18,
Paint Room, Batch Area

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|--------------|
| 1) Are containers in good condition? | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 2) Are containers compatible with waste in them? | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 3) Are containers managed to prevent leaks? | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 4) Are containers stored closed? | <u>—</u> | <u>✓</u> | <u>—</u> | <u>160 I</u> |
| 5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| 6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| 7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| 8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? | | | | |
| a. Special handling? | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| b. No Smoking signs? | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| c. Separation and protection from ignition sources? | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| 9) Does the container storage area have adequate aisle space (about 2.5 feet)? | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection? | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |

*Maintenance Area
Drum not closed. Paint
Room drum not closed -
Corrected
Batching
Area
Drum
not
closed*

Preparedness and Prevention:

- | | | | | |
|--|-----------|----------|----------|--------------|
| 11) Security - Do security measures include: | | | | |
| a. 24- hour surveillance? or | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| b. Barrier around facility including controlled entry? | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| c. Danger sign(s) at entrance? | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| 12) Maintenance and Operation of Facility | | | | |
| a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | <u>No</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 13) If required, does the facility have the following equipment: | | | | |
| a. Internal communications or alarm systems? | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| b. Telephone or 2-way radios at the scene of operations? | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | <u>—</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify) | <u>✓</u> | <u>✓</u> | <u>—</u> | <u>340 I</u> |
| <i>Dedicated, Non Sparking Shovels not provided</i> | | | | |

- 14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?

✓ _ _ _

Testing and Maintenance of Emergency Equipment

- 15) a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
b. Is emergency equipment in operable condition?
- 16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)

✓ _ _ _
✓ _ _ _

✓ _ _ _

*TSD's Only

check for comments on back!

One-Fifty gallon container lab waste/solvent

Generator Accumulation Appendix

Location of Unit Lab

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
<u>40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)</u> | — | — | — | — |
| <hr/> | | | | |
| 2) Is the container clearly marked with the start of accumulation date?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | — | — | — |
| 3) Have more than 90 days elapsed since the date inspected in (a)?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | — | — | — |
| 4) Do wastes remain in accumulation tanks for more than 90 days?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | — | — | — |
| 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | — | — | — |
| <hr/> | | | | |
| <hr/> | | | | |
| <hr/> | | | | |

Satellite Accumulation

- | | | | | | |
|--|---|---|---|---|------|
| 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
<u>40 CFR 262.34 (329 IAC 3-9-5 (c))</u> | — | ✓ | — | — | I 12 |
| 2) Are containers in good condition, compatible with the wastes in them and stored closed?
<u>40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))</u> | — | ✓ | — | — | I 12 |
| <hr/> | | | | | |
| <hr/> | | | | | |

Three - Approx 15 gallon Lab Waste/Solvents

Use and Management of Containers

Location of Unit Naptha Storage Building (Antennas)

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 1) Are containers in good condition? | / | | | |
| 2) Are containers compatible with waste in them? | / | | | |
| 3) Are containers managed to prevent leaks? | / | | | |
| 4) Are containers stored closed? | / | | | |
| 5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). | / | | | |
| 6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) | | | | / |
| 7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | | | | / |
| 8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? | | | | / |
| a. Special handling? | | | | / |
| b. No Smoking signs? | / | | | |
| c. Separation and protection from ignition sources? | / | | | |
| 9) Does the container storage area have adequate aisle space (about 2.5 feet)? | / | | | |
| 10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection? | / | | | |

Preparedness and Prevention:

- | | | | | |
|--|---|----|--|-------|
| 11) Security - Do security measures include: | | | | |
| a. 24-hour surveillance? or | / | | | |
| b. Barrier around facility including controlled entry? | / | | | |
| c. Danger sign(s) at entrance? | / | | | |
| 12) Maintenance and Operation of Facility | | | | |
| a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | | NO | | |
| 13) If required, does the facility have the following equipment: | | | | |
| a. Internal communications or alarm systems? | / | | | |
| b. Telephone or 2-way radios at the scene of operations? | / | | | |
| c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | | | | |
| Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify) | / | / | | 340 I |

17C) See pg 23

- 14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?

✓ _ _ _ _

Testing and Maintenance of Emergency Equipment

- 15) a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
b. Is emergency equipment in operable condition?
- 16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)

✓ _ _ _ _
_ _ _ _

✓ _ _ _ _

*TSD's Only

check for comments on back!

Use and Management of Containers

Location of Unit Container Storage Pad (Current Status)

- | | OK | DF | NI | NA | |
|--|----|----|----|----|--|
| 1) Are containers in good condition? | — | ✓ | — | — | 410 I |
| 2) Are containers compatible with waste in them? | ✓ | — | — | — | one drum side den
one drum
lid bulge |
| 3) Are containers managed to prevent leaks? | ✓ | — | — | — | |
| 4) Are containers stored closed? | ✓ | — | — | — | |
| 5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). | ✓ | — | — | — | |
| 6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) | — | — | — | ✓ | |
| 7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | — | — | — | ✓ | |
| 8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? | — | — | — | ✓ | |
| a. Special handling? | — | ✓ | — | — | |
| b. No Smoking signs? | — | ✓ | — | — | |
| c. Separation and protection from ignition sources? | — | ✓ | — | — | |
| 9) Does the container storage area have adequate aisle space (about 2.5 feet)? | — | ✓ | — | — | 8) No No Smoking Signs |
| 10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection? | — | ✓ | — | — | |

Preparedness and Prevention:

- | | | | | | |
|--|---|---|---|---|---|
| 11) Security - Do security measures include: | | | | | |
| a. 24-hour surveillance? or | — | — | — | ✓ | |
| b. Barrier around facility including controlled entry? | — | ✓ | — | — | I |
| c. Danger sign(s) at entrance? | — | ✓ | — | — | I |
| 12) Maintenance and Operation of Facility | | | | | |
| a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | — | — | — | — | Proper Hoyt No signs - gate not locked |
| 13) If required, does the facility have the following equipment: | | | | | |
| a. Internal communications or alarm systems? | ✓ | — | — | — | Yes - oil drip/spilling
all over pad & running
off pad see pg 5 |
| b. Telephone or 2-way radios at the scene of operations? | ✓ | — | — | — | |
| c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | — | — | — | — | |
| Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify) | — | ✓ | — | — | 340 I |

13C) see pg 23

- 14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?

✓

I 340

Testing and Maintenance of Emergency Equipment

- 15) a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
b. Is emergency equipment in operable condition?

✓
✓

- 16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)

14) Too far to phone - single employee movement

*TSD's Only

check for comments on back!



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NANCY A. MALOLEY, Commissioner

RECEIVED
SEP 14 1988

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

September 9, 1988

VIA CERTIFIED MAIL P 652 575 569

Mr. Jeffrey L. Bruestle
Sheller Globe Corporation
4444 North Detroit Avenue
Toledo, Ohio 43612

Re: Letter of Warning
IND 006066435, Montpelier, Indiana
IND 079589628, Muncie, Indiana

Dear Bruestle:

Our records indicate that the facilities indicated above are not in compliance with the Indiana hazardous waste financial assurance rules for the following reason(s):

1. No filing of proof of insurance for liability protection for sudden occurrences, as required by 329 IAC 3-22-24.

Failure to bring these facilities into compliance with the Indiana hazardous waste financial assurance rules (329 IAC 3-22) by October 12, 1988, will result in the referral of this matter to the Enforcement Section. If you have any questions regarding this, please contact me at AC 317/232-8901.

Very truly yours,

Jeffrey W. Stevens
Legal Analyst
Solid and Hazardous Waste Management

JWS/lea

cc: Ms. Sally K. Swanson, U.S. EPA, Region V



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

RECEIVED
JUL 18 1988

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603
July 15, 1988

VIA CERTIFIED MAIL

Mr. Jeffrey L. Bruestle
Sheller Globe Corporation
4444 North Detroit Avenue
Toledo, Ohio 43612

Re: Letter of Warning
IND 006066435, Montpelier, Indiana
IND 079589628, Muncie, Indiana

Dear Mr. Bruestle:

Our records indicate that the facilities indicated above are not in compliance with the Indiana hazardous waste financial assurance rules for the following reason(s):

1. No filing of proof of insurance for liability protection for sudden occurrences, as required by 329 IAC 3-22-24.

Failure to respond to this notice by August 17, 1988, will result in the referral of this matter to the Enforcement Section. If you have any questions regarding this, please contact me at AC 317/232-8901.

Very truly yours,

Jeffrey W. Stevens

Jeffrey W. Stevens
Legal Analyst
Solid and Hazardous Waste Management

JWS/rmw

cc: Ms. Sally K. Swanson, U.S. EPA, Region V
Mr. Thomas A. Dixon, Attorney



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

Swanson

RECEIVED
DEC 16 1987

105 South Meridian Street

P.O. Box 6015

Indianapolis 46206-6015

Telephone 317-232-8603

DEC 14 1987

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Mr. Dean Monroe
Sheller-Globe Corporation
623 West Monroe Street
Montpelier, Indiana 47359

Re: Notice of Compliance, Case No. V-217
Sheller-Globe Corporation
EPA I.D. No. IND 006066435
Montpelier, Indiana

Dear Mr. Monroe:

Based upon documents available to the Office of Solid and Hazardous Waste Management staff as a result of a reinspection on June 2, 1987, and a record review on November 12, 1987, it has been determined that Sheller-Globe Corporation has achieved compliance with the terms of the Notice of Violation issued to your firm on November 15, 1985.

Thank you for your cooperation. If you have any questions concerning this matter, feel free to contact Mr. Robert C. Steele of the Office of Solid and Hazardous Waste Management at AC 317/232-4464.

Sincerely,

Thomas Russell for

Jane Magee
Assistant Commissioner for
Solid and Hazardous Waste Management

RCS/rmw

cc: Blackford County Health Department
Ms. Sally K. Swanson, U.S. EPA, Region V ✓
Mr. D. Bruce Kizer

15 JUN 1989

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Dean Monroe
Sheller Globe Corporation
623 W. Monroe Street
Montpelier, Indiana 47359

Re: Notice of Violation
Sheller Globe Corporation
IND 006 066 435

Dear Mr. Monroe:

On March 13, 1989, the Indiana Department of Environmental Management (IDEM), representing the United States Environmental Protection Agency, (U.S. EPA), conducted an Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of Title 329 of the Indiana Administrative Code, and also the land disposal restrictions of certain spent solvents (F001-F005) and dioxins which became effective on November 8, 1986, and certain hazardous wastes commonly referred to as California List wastes which became effective on July 8, 1987. Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988. Regulations are set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

As a result of the inspection, we have determined that the requirements of the land disposal restriction regulations are being violated.

1. The facility did not revise its waste analysis plan to meet the requirements of 40 CFR Part 268, as required under 40 CFR Part 265.13. Waste analysis plans must contain all the information which must be know to treat, store, or dispose of waste in accordance with the requirements of 40 CFR Parts 265.13, and 268. Please provide this office with a copy of your revised waste analysis plan addressing the requirements of 40 CFR Part 268.
2. The facility was shipping F-solvent wastes to treatment facilities without complete notifications, as required under 40 CFR Part 268.7. Under Part 268.7(a)(1), generators who manage F-solvent wastes which exceed treatment standards (reference 40 CFR Part 268, Subpart D - Treatment Standards) are required to

provide a notification for each shipment of waste to a treatment facility. The notification must contain the following information: EPA hazardous waste number; applicable treatment standard; manifest number; and waste analysis data, where available. The notification must be supplied to the treatment facility as a separate document accompanying the manifest. Please include in your response to this NOV, an example of the notification you will supply to the treatment facility.

3. The facility's operating record did not contain copies of the notifications sent to treatment facilities. Under 40 CFR Part 268.7(a)(6), generators must retain on-site a copy of all notifications produced pursuant to Part 268.7 for at least five (5) years from the date that the waste was last sent to off-site or on-site treatment, storage, or disposal. The generator is responsible for obtaining from the applicable storage, treatment, or disposal facilities a copy of all notifications sent pursuant to Part 268.7 for all applicable F-solvent waste shipments. These notifications and all subsequent ones must be kept on file at the generating facility. Please include in your response to this NOV, an example of the notification you are supplying to treatment, storage, or disposal facilities and will keep on file at your facility.

4. The facility's operating record did not track the quantity of F-solvent wastes entered and removed from storage, as required under 40 CFR Parts 265.73 and 268.50. Also, the dates on F-solvent drums differed from the dates in the operating record. Please include in your response, photographs and copies of the most recent entries in your operating log demonstrating compliance with 40 CFR Parts 265.73 and 268.50.

5. The facility misclassified F-solvent wastes F003, and F005 as D001. Under 40 CFR Part 268.7(a), the generator must test the waste or an extract developed using the test method described in Appendix I of this Part, or use knowledge of the waste to determine if the waste is restricted from land disposal. If the latter method is used, all supporting data used to make the determination must be maintained in your files. For solvent mixtures, the virgin solvent mixture must contain less than ten percent listed solvents prior to use to be classified D001.

6. The facility did not clearly mark all containers to identify the date(s) entering storage. In accordance with Part 268.50(a)(2)(i), each container must be clearly marked to identify its contents and the date each period of accumulation begins. Photographs showing appropriate labelling (labelling must be legible) may be submitted as evidence of compliance with these requirements.

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:

Mr. Dean Monroe
Sheller Globe Corporation
623 W. Monroe Street
Montpelier, Indiana 47359

4. Article Number

P 682 707 939

Type of Service:

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED**.

5. Signature — Addressee

X *Dean Monroe*

6. Signature — Agent

X

7. Date of Delivery

8. Addressee's Address (ONLY if requested and fee paid)

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further enforcement action.

If you have any questions regarding this correspondence, please contact Mr. Gregory T. Carlson of my staff at (312) 886-8095.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Dennis Zawodni, IDEM

bcc: Sally Swanson, REB

5HR-12:G.CARLSON:sm:8-8093:05/31/89:disk #2:PC:FILENAME:MONROE

sm
5/11/89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	NTC 6/8/89	SKS 6-13-89	

STATE OF INDIANA

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT



105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015

RECEIVED
NOV 20 1987

U.S. EPA REGION 1
WASTE MANAGEMENT DIVISION
Hazardous Waste Enforcement Section

VIA CERTIFIED MAIL

Mr. Thomas A. Dixon
Eastman and Smith
800 United Savings Building
Toledo, OH 43604-1141

Re: Sheller Globe Corporation
IND 006066377, Union City, Indiana
IND 005380381, Grabill, Indiana
IND 006666435, Montpelier, Indiana
IND 079589628, Muncie, Indiana
Notice of Violation (V-479)

Dear Mr. Dixon:

This notice is in reference to our letter of November 7, 1986, (copy enclosed) concerning compliance with closure financial assurance requirements.

You were requested by that letter to demonstrate compliance with the financial assurance requirements of 320 IAC 4.1-22-1 through and including 320 IAC 4.1-22-35 on or before November 28, 1986, for the subject facilities.

We have received your letter of December 2, 1986, which included the Irrevocable Standby Letter of Credit dated October 2, 1986; however, as of the date of this notice, we have not received an originally signed duplicate of the trust agreement as required at 320 IAC 4.1-22-7(c)(1).

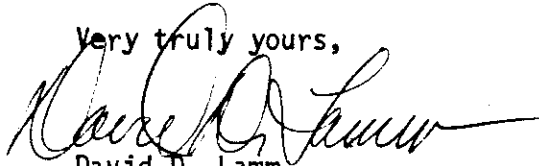
Please submit within twenty (20) calendar days of receipt of this notice, a duplicate of the trust agreement with original signatures.

Failure to submit the trust agreement and verify a return to compliance with the financial assurance requirements will result in escalated enforcement action.

Mr. Thomas A. Dixon
Page 2

If you have any questions, please contact Mr. Rod Steele of the Office of Solid and Hazardous Waste Management, Department of Environmental Management at AC 317/232-3405.

Very truly yours,

A handwritten signature in black ink, appearing to read "David D. Lamm", with a long horizontal flourish extending to the right.

David D. Lamm
Assistant Commissioner for
Solid and Hazardous Waste Management

RJS/rmw

Enclosure

cc: Ms. Sally K. Swanson ✓
Mr. Jeffrey W. Stevens



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603
June 22, 1987

VIA CERTIFIED MAIL P 395 652 413

Mr. Thomas A. Dixon, Esquire
Eastman and Smith
800 United Savings Building
Toledo, OH 43604-1141

Re: Letter of Warning, Sheller Globe Corporation
IND 006066377, Union City, Indiana
IND 005380381, Grabill, Indiana
IND 006666435, Montpelier, Indiana *NG*
IND 079589628, Muncie, Indiana

Dear Mr. Dixon:

IND 006066 435

Please be advised that according to the U.S. EPA mandate, this office can no longer exercise enforcement discretion by accepting a "good faith effort" standard in lieu of the liability coverage required by 320 IAC 4.1-22-24. Therefore, failure to bring these facilities into compliance with 320 IAC 4.1-22-24 by August 17, 1987, will result in the referral of this matter to the Enforcement Section. If you have any questions regarding this matter, please contact me at AC 317/232-8901.

Very truly yours,

Jeffrey W. Stevens
Jeffrey W. Stevens
Legal Analyst
Solid and Hazardous Waste Management

JWS/drc
Enclosure
cc: Ms. Sally Swanson, U.S. EPA, Region V
Mr. Bernie Orenstein, U.S. EPA, Region V



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

VIA CERTIFIED MAIL

JUL 06 1987

Mr. Dean Monroe
Sheller-Globe Corporation
623 West Monroe Street
Montpelier, IN 47359

Re: Notice of Inadequacy (V-217)
Sheller-Globe Corporation
EPA I.D. No. IND 006066435
Montpelier, Indiana

Dear Mr. Monroe:

This will acknowledge the receipt of information from Sheller-Globe Corporation on May 8, 1987. This information was submitted in response to our Notice of Violation dated November 15, 1985, regarding your firm's compliance with Indiana Code 13-7, the Indiana Environmental Management Act, and 320 IAC 4.1, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements."

On June 2, 1987, an inspection of Sheller-Globe Corporation, located in Montpelier, Indiana, was conducted by Mr. D. Bruce Kizer of the Department of Environmental Management's Office of Solid and Hazardous Waste Management.

Staff has reviewed the materials submitted and the results of the inspection and determined that Sheller-Globe Corporation has not achieved compliance with the hazardous waste management requirements under 320 IAC 4.1. Our concerns are listed below:

1. Facility lacked personnel training records for Messrs. Dean Monroe, Terry Seagrave, and Greg Simon. Personnel training records for other personnel lacked job descriptions.
2. Containers were not stored closed. Two 55-gallon containers were observed open during the inspection.
3. The contingency plan does not include a list of emergency equipment.

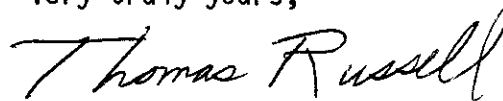
Your response must be revised or supplemented as necessary to address these deficiencies and be submitted to this office within thirty (30) days.

Mr. Dean Monroe
Page 2

Failure of your firm to respond fully and adequately, within the time specified, and document compliance with the hazardous waste management rules will result in escalated enforcement.

If you have any questions regarding this matter, please contact Mr. Robert C. Steele of this office at AC 317/232-4464.

Very truly yours,

A handwritten signature in cursive script that reads "Thomas Russell".

Thomas Russell, Chief
Enforcement Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

RCS/rmw

cc: Blackford County Health Department
Ms. Sally K. Swanson, U.S. EPA, Region V ✓
Mr. D. Bruce Kizer

STATE OF INDIANA

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT



INDIANAPOLIS, 46225

105 South Meridian Street

RECEIVED

OCT 21 1986

OCT 23 1986

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

VIA CERTIFIED MAIL

Mr. Donald W. Schumacker
Sheller Globe Corporation
State Road 18
623 West Monroe Street
Montpelier, IN 47359

Re: RCRA Facility Inspection
Sheller Globe Corporation - Montpelier
IND 006066435
Notice of Inadequacy (V-217)

Dear Mr. Schumacker:

This will acknowledge the receipt of information from Sheller Globe Corporation - Montpelier on July 12, 1986 and August 22, 1986. This information was submitted in response to our letter of June 3, 1986, citing violations of the Federal Resource Conservation and Recovery Act (RCRA) and 320 IAC 4.1.

Staff has reviewed the materials submitted and determined that they are inadequate to achieve compliance with RCRA and 320 IAC 4.1. Our concerns pertaining to these materials are:

1. The waste analysis plan is inadequate in that:
 - a. The rationale for the selection of parameters does not contain enough information or supporting documentation (i.e., MSDS, previous tests, knowledge of operation, etc.); and
 - b. The frequency with which the initial analyses of the waste will be reviewed or repeated to ensure that the analysis is accurate and up to date has not been included.
2. The inspection schedule does not include security devices and communication and alarm systems.
3. The inspection schedule for the emergency equipment lacks:
 - a. Types of problems which are to be looked for during the inspections; and
 - b. Frequency of inspection.

Mr. Donald W. Schumacker
Page 2

4. The previously submitted schedule (January 17, 1985) for drum storage was adequate. This schedule for drum storage submitted July 12, 1986, would be more appropriate as an inspection log.
5. The inspection log does not include a space for a notation of observations made and nature of any repairs or other remedial actions.
6. The arrangements made with local authorities are inadequate. An attempt to make arrangements pursuant to 320 IAC 4.1-17-7 must be made. (Copy of 4.1-17-7 enclosed)
7. There is no description of arrangements made with the local hospitals.
8. Based on the results of the sampling and analysis of the MDI contaminated soil, it appears the soil is not a hazardous waste. As directed in the November 15, 1985, Notice of Violation, remove and dispose of the MDI contaminated soil to a level of six (6) inches below visible contamination.

Please revise these materials and submit them to our office within 20 days.

If you have any questions, please call Mr. Dennis Zawodni at the Department of Environmental Management, AC 317/232-3407.

Very truly yours,



Thomas Russell, Chief
Enforcement Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

DMZ/tjd

cc: Blackford County Health Department
Ms. Sally Swanson, U.S. EPA, Region V ✓
Mr. Bruce Kizer

320 IAC 4.1-17-3 Required equipment

Authority: IC 13-7-3-1; IC 13-7-5-1; IC 13-7-7;
IC 13-7-8.5-4

Affected: IC 13-7-8.5

Sec. 3. All facilities must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:

(a) an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel;

(b) a device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams;

(c) portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and

(d) water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.

(Indiana Environmental Management Board; 320 IAC 4.1-17-3)

320 IAC 4.1-17-4 Testing and maintenance of equipment

Authority: IC 13-7-3-1; IC 13-7-5-1; IC 13-7-7;
IC 13-7-8.5-4

Affected: IC 13-7-8.5

Sec. 4. All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency.

(Indiana Environmental Management Board; 320 IAC 4.1-17-4)

320 IAC 4.1-17-5 Access to communications or alarm system

Authority: IC 13-7-3-1; IC 13-7-5-1; IC 13-7-7;
IC 13-7-8.5-4

Affected: IC 13-7-8.5

Sec. 5. (a) Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required under 320 IAC 4.1-17-3.

(b) If there is ever just one employee on the premises while the facility is operating, he must have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance, unless such a device is not required under 320 IAC 4.1-17-3. (Indiana Environmental Management Board; 320 IAC 4.1-17-5)

320 IAC 4.1-17-6 Required aisle space

Authority: IC 13-7-3-1; IC 13-7-5-1; IC 13-7-7;
IC 13-7-8.5-4

Affected: IC 13-7-8.5

Sec. 6. The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes. (Indiana Environmental Management Board; 320 IAC 4.1-17-6)

***320 IAC 4.1-17-7 Arrangements with local authorities**

Authority: IC 13-7-3-1; IC 13-7-5-1; IC 13-7-7;
IC 13-7-8.5-4

Affected: IC 13-7-8.5

Sec. 7. (a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;

(2) where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority;

(3) agreements with State emergency response teams, emergency response contractors, and equipment suppliers; and

(4) arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

(b) Where state or local authorities decline to enter into such arrangements, the owner or operator must

document the refusal in the operating record. (*Indiana Environmental Management Board; 320 IAC 4.1-17-7*)

Rule 18. Existing Hazardous Waste Facility Standards: Contingency Plan and Emergency Procedures

320 IAC 4.1-18-1 Applicability

Authority: IC 13-7-3-1; IC 13-7-5-1; IC 13-7-7;
IC 13-7-8.5-4

Affected: IC 13-7-8.5

Sec. 1. 320 IAC 4.1-18 applies to owners and operators of all hazardous waste facilities, except as 320 IAC 4.1-15-1 provides otherwise. (*Indiana Environmental Management Board; 320 IAC 4.1-18-1*)

320 IAC 4.1-18-2 Contingency plan; purpose and implementation

Authority: IC 13-7-3-1; IC 13-7-5-1; IC 13-7-7;
IC 13-7-8.5-4

Affected: IC 13-7-8.5

Sec. 2. (a) Each owner or operator must have a contingency plan for his facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

(b) The provisions of the plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. (*Indiana Environmental Management Board; 320 IAC 4.1-18-2*)

320 IAC 4.1-18-3 Contingency plan; content

Authority: IC 13-7-3-1; IC 13-7-5-1; IC 13-7-7;
IC 13-7-8.5-4

Affected: IC 13-7-8.5

Sec. 3. (a) The contingency plan must describe the actions facility personnel must take to comply with 320 IAC 4.1-18-2 and 320 IAC 4.1-18-7 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

(b) If the owner or operator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR Part 112, or National Oil & Hazardous Substance Pollution Contingency Plan 40 CFR Part 300, or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the

requirements of 320 IAC 4.1-15 through 320 IAC 4.1-32.

(c) The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 320 IAC 4.1-17-7.

(d) The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see 320 IAC 4.1-18-6), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.

(e) The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

(f) The plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires). (*Indiana Environmental Management Board; 320 IAC 4.1-18-3*)

320 IAC 4.1-18-4 Copies of contingency plan

Authority: IC 13-7-3-1; IC 13-7-5-1; IC 13-7-7;
IC 13-7-8.5-4

Affected: IC 13-7-8.5

Sec. 4. A copy of the contingency plan and all revisions to the plan must be:

(a) maintained at the facility; and

(b) Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

(*Indiana Environmental Management Board; 320 IAC 4.1-18-4*)

320 IAC 4.1-18-5 Contingency plan; amendment

Authority: IC 13-7-3-1; IC 13-7-5-1; IC 13-7-7;
IC 13-7-8.5-4

Affected: IC 13-7-8.5

Sec. 5. The contingency plan must be reviewed, and immediately amended, if necessary, whenever:

STATE OF INDIANA



INDIANAPOLIS

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

June 3, 1986

VIA CERTIFIED MAIL

Mr. Donald W. Schumacker
Sheller Globe Corporation
State Road 18
623 West Monroe Street
Montpelier, IN 47359

Dear Mr. Schumacker:

Re: RCRA Facility Inspection
Sheller Globe Corporation
IND 006066435
Notice of Inadequacy (V-217)

This will acknowledge the receipt of information from Sheller Globe Corporation on January 17, 1986. This information was submitted in response to our letter of November 15, 1985, citing violations of the Federal Resource Conservation and Recovery Act (RCRA) and 320 IAC 4.1.

Staff has reviewed the materials submitted and determined that they are inadequate to achieve compliance with RCRA and 320 IAC 4.1. Our concerns pertaining to these materials are:

1. Submit a copy of the analysis results of the MDI contaminated soil.
2. The waste analysis plan lacks the following:
 - a. The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters (i.e., how analysis for these parameters will provide sufficient information on the waste's properties);
 - b. The test methods which will be used to test for these parameters;
 - c. The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either;

- (i) One of the sampling methods described in 320 IAC 4.1-6-5; or
 - (ii) An equivalent sampling method.
- (d) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date;
- 3. The inspection schedule and inspection log must include emergency equipment, security devices, and operating and structural devices.
- 4. The inspection log lacks the time of inspection.
- 5. The contingency plan lacks the following:
 - (a) A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services;
 - (b) The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications, and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up-to-date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.
 - (c) The plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).
- 7. The response does not indicate that a means to control entry has been provided.

Please revise these materials and submit them to our office within twenty (20) days.

If you have any questions, please call Mr. Dennis Zawodni of the office of Solid and Hazardous Waste Management, Department of Environmental Management, at AC 317/243-5051.

Very truly yours,

A handwritten signature in cursive script that reads "Thomas Russell".

Thomas Russell, Chief
Enforcement Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

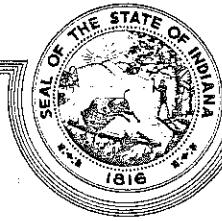
DMZ/lsm

cc: Blackford County Health Department

Ms. Sally K. Swanson, U.S. EPA, Region V

Mr. Bruce Kizer

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

VIA CERTIFIED MAIL

November 15, 1985

Mr. Donald W. Schumacker
Sheller Globe Corporation
State Road 18
623 West Monroe Street
Montpelier, IN 47359

Dear Mr. Schumacker:

Re: RCRA Facility Inspection
Sheller Globe Corporation
IND 006066435
Notice of Violation (V-217)

The Environmental Management Board is cooperating with the U.S. Environmental Protection Agency, Region V, in carrying out the provisions of the Resource Conservation and Recovery Act, Public Law 94-580 (RCRA). In this effort, representatives of the Environmental Management Board are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of hazardous waste. In addition to RCRA requirements, facilities are being inspected to determine compliance with Environmental Management Board 320 IAC 4.1, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements."

This is to inform you that on September 25, 1985, an inspection of Sheller Globe Corporation, located at Montpelier, Indiana, was conducted by Mr. Bruce Kizer of the Division of Land Pollution Control (Division), Indiana State Board of Health. You represented your firm at this inspection.

The following violations of RCRA and 320 IAC 4.1 pertaining to the operation of your facility were noted:

1. 320 IAC 4.1-7-2 Generator has not determined if the waste paint booth filters are hazardous. (This includes the waste paint filters from the automatic and manual operations.)

2. 320 IAC 4.1-17-2 There is evidence of release of hazardous waste or hazardous waste constituents on premises which could threaten human health or the environment. MDI was spilled on the ground around the drum storage area.
3. 320 IAC 4.1-16-4 Owner or operator has not obtained a detailed chemical and physical analysis of each waste.
4. 320 IAC 4.1-16-4 Owner or operator does not have a detailed waste analysis plan on file at the facility.
5. 320 IAC 4.1-16-6 Owner or operator does not conduct required inspections.
6. 320 IAC 4.1-16-6 Owner or operator has not developed a written inspection schedule.
7. 320 IAC 4.1-16-6 Owner or operator does not record inspections in an inspection log.
8. 320 IAC 4.1-16-7 Personnel have not received required training.
9. 320 IAC 4.1-17-7 Owner or operator has not attempted to make arrangements with appropriate authorities in case of an emergency at the facility.
10. 320 IAC 4.1-18-2 Lack of contingency plan.
11. 320 IAC 4.1-19-4 The operating record does not contain all closure cost estimates.
12. 320 IAC 4.1-21-3 Closure plan is not available for inspection.
13. 4320 IAC 4.1-16-5 Security measures do not include a means to control entry.
14. 320 IAC 4.1-16-5 Danger signs are not posted at the entrance to the active portion of the facility.
15. 320 IAC 4.1-17-3 Lack of an internal communications system or an alarm system.
16. 320 IAC 4.1-17-5 Three (3) hazardous waste containers were not properly closed during accumulation.

- 17. 320 IAC 4.1-17-5 Start of accumulation period was not clearly marked on each hazardous waste container.
- 18. 320 IAC 4.1-17-5 Hazardous waste containers were not properly marked with the words "Hazardous Waste."
- 19. IC 13-7-4-1(c) No person shall deposit any contaminants upon the land in such place and manner which creates, or which would create, a pollution hazard. Waste oil has been spilled on the ground in the loading dock area, along the west side of the warehouse and in the drum storage area near the creek.

Sheller Globe Corporation, within thirty (30) calendar days of receipt of this letter, shall achieve compliance with the following requirements:

1. Determine if the waste paint filters generated are hazardous as defined by 320 IAC 4.1-5-1 through 4.1-6-4 (formerly Subparts C and D of 40 CFR 261 and 320 IAC 4-3-1). (If you believe the waste is not hazardous, include evidence to support your decision.)
2. Remove the spilled MDI in the drum storage area to a level of six (6) inches below visible contamination.
3. Dispose of the MDI contaminated soil at a treatment, storage, or disposal facility with an EPA identification number.
4. Submit a copy of the manifest for the shipment of the spilled MDI to this office.
5. Obtain a detailed chemical and physical analysis of each waste.
6. Prepare a detailed waste analysis plan and keep it on file at the facility.
7. Conduct inspections as required by 320 IAC 4.1-16-6.
8. Develop a written inspection schedule.
9. Record all inspections in an inspection log.
10. Provide a training program as described in 320 IAC 4.1-16-7 (formerly 40 CFR 265.16 and 320 IAC 4-6-1) for all personnel involved in hazardous waste management.

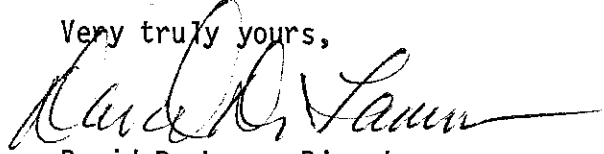
11. Document a training program as described in 320 IAC 4.1-16-7 (formerly 40 CFR 265.16 and 320 IAC 4-6-1) for all personnel involved in hazardous waste management.
12. Owner or operator shall attempt to make arrangements with appropriate authorities in case of an emergency at the facility.
13. Prepare a contingency plan as described in 320 IAC 4.1-18-2 (formerly 40 CFR 265.51 through 265.54 as adopted in 320 IAC 4-6-1). Submit a copy of your Plan to this office.
14. Copies of the contingency plan shall be on file at the site, state, and local emergency organizations.
15. Include closure costs in the operating record.
16. Make the closure plan available for inspector and submit a copy of the plan to this office.
17. Security measures must include a means to control entry.
18. Post danger signs at the entrance to the on-site storage area.
19. Provide an internal communication system or an alarm system.
20. Accumulate all hazardous waste in containers that are properly closed.
21. Mark the start of the accumulation period on each hazardous waste container.
22. Mark each container used to accumulate hazardous waste with the words "Hazardous Waste."
23. Remove the spilled oil to a level of two (2) inches below visible contamination. Disposal of this material in a landfill in Indiana will require an approval from the Special Projects Section in this office. Enclosed is a form describing how to obtain permission to dispose of this waste.

Your Company shall submit to this office, within thirty-five (35) calendar days of receipt of this letter, a written detailed explanation of the steps taken to achieve compliance. The letter shall state the date compliance was achieved.

Failure to respond adequately to this Notice of Violation and verify a return to compliance at this facility will result in escalated enforcement action.

Please direct your response to this letter and any questions to Mr. Dennis Zawodni of this Division at AC 317/243-5051.

Very truly yours,

A handwritten signature in dark ink, appearing to read "David D. Lamm", with a long horizontal flourish extending to the right.

David D. Lamm, Director
Division of Land Pollution Control

DMZ/tr

Enclosure

cc: Blackford County Health Department
Ms. Sally K. Swanson, U.S. EPA, Region V
Mr. Bruce Kizer

Received by SEA during RCEA
Inspection of 3/13/89

CHEMICAL WASTE LOG
SHELLER-GLOBE CORP.
MONTPELIER, IN.

PAGE

15

DRUM NO.	DESCRIPTION	SOURCE	ACCUMULATION START DATE	ACCUMULATION LOCATION	STORAGE LOCATION	DISPOSAL DATE
240	Waste Flammable Liquid N.O.S.	M window	10/31	M W	DP	12/9/88
241	Waste Flammable Liquid N.O.S.	M window	10/31	M W	DP	12/9/88
242	Waste Flammable Liquid N.O.S.	M window	10/31	M W	DP	12/9/88
243	Waste Flammable Liquid N.O.S.	M window	10/31	M W	DP	12/9/88
244	Waste Flammable Liquid N.O.S.	M window	11/16/88	M W	DP	12/9/88
245	Waste Compound cleaning Liquid	M Van	10/31/88	M Van	DP	12/9/88
246	Waste compound cleaning Liquid	M Van	10/31/88	M Van	DP	12/9/88
247	Waste Flammable Liquid N.O.S.	M window	11-16-88	M W	DP	12/9/88
248	Waste Flammable Liquid N.O.S.	M window	11-16-88	M W	DP	12/9/88
249	Waste Flammable Liquid N.O.S.	M window	11-28-88	M W	DP	12/9/88
250	Waste Flammable Liquid N.O.S.	M window	11-28-88	M W	DP	12/9/88
251	Waste Flammable Liquid N.O.S.	M window	12-8-88	M W	DP	12/9/88
252	Waste Flammable Liquid N.O.S.	M window	12-8-88 12-10-88	M W	DP	
253	Waste Flammable Liquid N.O.S.	M window	12-8-88	M W	DP	12/9/88
254	Waste Flammable Liquid N.O.S.	M window	12-8-88	M W	DP	12/9/88
255	Hazardous waste ORM-F	M window	12-8-88	M W	DP	12/9/88
256	Waste Flammable Liquid N.O.S.	M Shed	12/8/88	M Shed	DP	12/9/88
257	Waste Flammable Liquid N.O.S.	M Shed	12/8/88	M Shed	DP	12/9/88

Revised by DEN during ECEA
Inspection 12/13/88

CHEMICAL WASTE LOG
SHELLER-GLOBE CORP.
MONTPELIER, IN.

ROW NO.	DESCRIPTION	SOURCE	ACCUMULATION START DATE	ACCUMULATION LOCATION	STORAGE LOCATION	DISPOSAL DATE
258	Hazardous waste ORM-E	N Shed	12/8/88	DP	DP	12/9/88
259	Flammable waste NOS	M window	12/8/88	DP	DP	12/9/88
260	Hazardous waste Waste ORM-E	B Pillar	12/8/88	B Pillar	DP	12/9/88
261	Waste Flammable Liquid NOS	N Shed	12/8/88	SKID NOS	DP	12/9/88
262	Waste Flammable Liquid NOS	N Shed	12/8/88	SKID NOS	DP	12/9/88
263	Waste Flammable Liquid NOS	N Shed	12/8/88	SKID NOS	DP	12/9/88
264	Waste Flammable Liquid NOS	N Shed	12/8/88	SKID NOS	DP	12/9/88
265	Hazardous waste NOS, ORM-E	M window	2/10/89	Mch	DP	
266	Waste Flammable Liquid NOS	M window	1/11/88	Mw	DP	
267	Waste Flammable Liquid NOS	M window	1/11/88	Mw	DP	
268	Waste Flammable Liquid NOS	M window	1/11/88	Mw	DP	
269	Waste Flammable Liquid NOS	M window	1/11/88	Mw	DP	
270	Lab waste NOS Hazardous waste ORM-E	Lab	1/11/88	N Shed	N Shed	
271	Waste compound Cleaning liquid	M van	1/11/88	M van	DP	
272	Waste compound Cleaning liquid	M van	1/11/88	M van	DP	
273	Waste Flammable liquid NOS	M window	2/10/89	M window	DP	
274	Waste Flammable liquid NOS	M window	2/10/89	M window	DP	
275	Waste Flammable liquid NOS	M window	2/10/89	M window	DP	

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CHEMICAL WASTE LOS
SHELLER-GLOBE CORP.
MONTPELIER, Vt.

[illegible]

PAGE 11

[illegible]

SAT. = SATELLITE
M.W. = MODULAR WINDOW
D.P. = DRUM PAD

LAND DISPOSAL RESTRICTITON RULE
Generator Notificaiton To
American Resource Recovery Corp.
Regarding Shipment of Wastes Restricted From Land Disposal

Generator Name Sheller-Globe Corporation
 Generator EPA ID# IND 006066 435
 Manifest # IN 034464 AND EPA Waste Codes F003, F005
 Comment IN 034463

This notification is submitted to American Resource Recovery Corporation in accordance with the Land Disposal Restrictions, Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7 (a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to American Resource Recovery Corp.

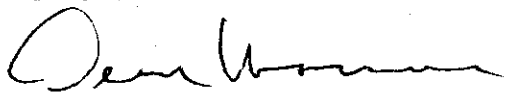
Treatment Standard of Constituents In Waste Extract

For each solvent waste constituent present in this waste, check the appropriate box in front of the treatment standard. Then read and sign #A.

Waste analysis data (attach if different from ARR qualification analysis).

Solvent Constituent	(mg/liter)	All other spent solvent wastes
Acetone	<input checked="" type="checkbox"/>	0.59
n-Butyl alcohol	<input type="checkbox"/>	5.0
Carbon disulfide	<input type="checkbox"/>	4.81
Carbon tetrachloride	<input type="checkbox"/>	0.96
Chlorobenzene	<input type="checkbox"/>	0.05
Cresols and cresylic acid	<input type="checkbox"/>	0.75
Cyclohexanone	<input type="checkbox"/>	0.75
1,2-Dichlorobenzene	<input type="checkbox"/>	0.125
Ethyl acetate	<input checked="" type="checkbox"/>	0.75
Ethyl ether	<input type="checkbox"/>	0.75
Ethyl benzene	<input type="checkbox"/>	0.053
Isobutanol	<input type="checkbox"/>	5.0
Methanol	<input checked="" type="checkbox"/>	0.75
Methylene chloride	<input type="checkbox"/>	0.96
Methylene chloride (from pharmaceutical industry)	<input type="checkbox"/>	0.96
Methyl ethyl ketone	<input checked="" type="checkbox"/>	0.75
Methyl isobutyl ketone	<input type="checkbox"/>	0.33
Nitrobenzene	<input type="checkbox"/>	0.125
Pyridine	<input type="checkbox"/>	0.33
Tetrachloroethylene	<input type="checkbox"/>	0.05
Toluene	<input checked="" type="checkbox"/>	0.33
1,1,1-Trichloroethane	<input type="checkbox"/>	0.41
1,2,2-Trichloro-1,2,2-trifluoroethane	<input type="checkbox"/>	0.96
Trichloroethylene	<input type="checkbox"/>	0.091
Trichlorofluoromethane	<input type="checkbox"/>	0.96
Xylene	<input type="checkbox"/>	0.15

#A The solvent waste constituents marked above do not meet the treatment standard and cannot be land disposed.


 Generator signature

7-10-89
 Date

LAND DISPOSAL RESTRICTITON RULE
Generator Notificaiton To
American Resource Recovery Corp.
Regarding Shipment of Wastes Restricted From Land Disposal

Generator Name Sheller-Globe Corporation
Generator EPA ID# IND 006066 435
Manifest # IN 08 4464 EPA Waste Codes D002, T002, D007
Comment _____

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Waste analysis data (attach if different from ARR qualification analysis).
(mg/liter)

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Carbon tetrachloride		0.96
Chlorobenzene		0.05
Cresols and cresylic acid		0.75
Cyclohexanone		0.75
1,2-Dichlorobenzene		0.125
Ethyl acetate		0.75
Ethyl ether		0.75
Ethyl benzene		0.053
Isobutanol		5.0
Methanol		0.75
Methylene chloride	X	0.96
Methylene chloride (from pharmaceutical industry)		0.96
Methyl ethyl ketone		0.75
Methyl isobutyl ketone		0.33
Nitrobenzene		0.125
Pyridine		0.33
Tetrachloroethylene		0.05
Toluene		0.33
1,1,1-Trichloroethane		0.41
1,2,2-Trichloro-1,2,2-trifluoroethane		0.96
Trichloroethylene		0.091
Trichlorofluoromethane		0.96
Xylene		0.15

#A The solvent waste constituents marked above do not meet the treatment standard and cannot be land disposed.



Generator signature

7-10-89

Date

LAND DISPOSAL RESTRICTITON RULE
Generator Notificaiton To
American Resource Recovery Corp.
Regarding Shipment of Wastes Restricted From Land Disposal

Generator Name Shell Chemical Corporation
 Generator EPA ID# FD 006 066 435
 Manifest # FD 08 4464 EPA Waste Codes F002
 Comment _____

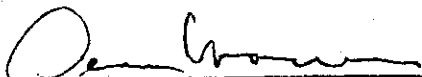
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1,2-Dichlorobenzene	0.125
Ethyl acetate	0.75
Ethyl ether	0.75
Ethyl benzene	0.053
Isobutanol	5.0
Methanol	0.75
Methylene chloride	0.96
Methylene chloride (from pharmaceutical industry)	0.96
Methyl ethyl ketone	0.75
Methyl isobutyl ketone	0.33
Nitrobenzene	0.125
Pyridine	0.33
Tetrachloroethylene	0.05
Toluene	0.33
1,1,1-Trichloroethane	X 0.41
1,2,2-Trichloro-1,2,2-trifluoroethane	0.96
Trichloroethylene	0.091
Trichlorofluoromethane	X 0.96
Xylene	0.15

#A The solvent waste constituents marked above do not meet the treatment standard and cannot be land disposed.



Generator signature

7-10-79

Date